

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED

NOV 14 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAVEN MULLINS, aka DUNNY, aka
DUN,
HENRY BURCHETT, aka NOODLES,
aka NOO, aka OMERTA,
ELIJAH JOHNSON, aka LOON,
DEMARCUS ELLIOTT, aka MOO, aka
FAST LANE,
DONTEZ HAMMOND, aka DONNY, aka
TEZ,
JEFFREY LEE, aka FATTY,
JERRELL JONES-FERRELL, aka RUGA,
DEVONTE JOHNSON, aka D NUT,
aka NUT,
JEROME WILLIAMS, aka JAY, aka JT,
CHRISTEPHER HORTON, aka CAM,
aka KILLA,
DEEUNDRA PERKINS, aka DRIZZY,
DEON BLACKWELL, aka WHITE BOY,
JAMES CLEMONS, aka FLOCK, aka
POPE, aka FULLY POPE FLOCK,
ALEX DARDEN, aka LIL' PEE WEE,
ESMOND WILLIAMS, aka RELLE,
ADRIONNA NULL, aka ALI,
MYEASHA WEST, aka ACTION,
KYLA SHARIE TYLER, aka YAYEO,

Defendants.

) SECOND SUPERSEDING
) INDICTMENT
)

) JUDGE J. PHILIP CALABRESE
)

) CASE NO.: 1:23CR00662
)

) Title 18, United States Code,
) Sections 2, 922(g)(1), 922(n),
) 924(a)(8), 924(c)(1)(A)(i),
) 924(a)(1)(D), 1952(a)(3),
) 1959(a)(1), 1959(a)(3), and
) 1962(d); Title 21, United States
) Code, Sections 841(a)(1),
) (b)(1)(A), (b)(1)(B), (b)(1)(C),
) (b)(1)(E), 843(b), and 846

COUNT 1
(RICO Conspiracy, 18 U.S.C. § 1962(d))

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Second Superseding Indictment, Defendants RAVEN MULLINS, aka DUNNY, aka DUN (“R. MULLINS”); HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; DEMARCUS ELLIOTT, aka MOO, aka FAST LANE; DONTÉZ HAMMOND, aka DONNY, aka TEZ; JEFFREY LEE, aka FATTY; JEROME WILLIAMS, aka JAY, aka JT (“J. WILLIAMS”); CHRISTEPHER HORTON, aka CAM, aka KILLA; JAMES CLEMONS, aka FLOCK, aka POPE, aka FULLY POPE FLOCK; ALEX DARDEN, aka LIL’ PEE WEE; and ESMOND WILLIAMS, aka RELLE (“E. WILLIAMS”), and others known and unknown to the Grand Jury, were each members and associates of a criminal organization, namely, the “Fully Blooded Felons,” (hereinafter, the “Enterprise” or “Fully Blooded Felons”), which was engaged in, among other things, acts of violence to include murder, kidnapping, assault, robbery, drug distribution, and firearms trafficking. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons operated in the Northern District of Ohio, and elsewhere.

2. The Fully Blooded Felons, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Fully Blooded Felons constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

Structure of the Enterprise

3. The Fully Blooded Felons was created in or around 2012 by R. MULLINS as a branch of the Heartless Felons, which is a criminal organization that was started in the Ohio Department of Youth Services facilities in or around 2002.

4. The Fully Blooded Felons are active throughout Ohio, with a concentration of criminal activity in the area of East 30th Street and Cedar Avenue and Longwood Avenue on the east side of Cleveland, as well as inside of the Ohio prison system.

5. In or around approximately 2023, R. MULLINS separated from the Heartless Felons and made the Fully Blooded Felons its own gang.

6. The highest rank in the Fully Blooded Felons was “Godfather,” a position held by R. MULLINS.

7. R. MULLINS oversaw the “Commission,” the governing body of the Fully Blooded Felons. The Commission had the authority to determine if a member committed a “violation” and determine the appropriate punishment, which could range from a fine to death.

8. The Commission was made up of a Head Commissioner and ten Commissioners. The role of the Head Commissioner was to maintain the structure and organization of the Fully Blooded Felons. The Commission could overrule decisions made by R. MULLINS by a majority vote on certain issues, such as fines. But, the Commission did not have the authority to overrule R. MULLINS on other matters, such as death being the punishment for a member’s cooperation with law enforcement.

9. Beneath Commissioners were “Capos,” who led up to 25 Fully Blooded Felon members under their command.

10. The Fully Blooded Felons had written rules that were created by R. MULLINS and another Fully Blooded Felon member. One set of rules was called the “Fully Five,” which included prohibitions against members disrespecting Capos or refusing to come to the aid of a fellow member. Fully Blooded Felon rules were disseminated to members and associates, who were expected to memorize them. Fully Blooded Felon members and associates were often quizzed on rules by R. MULLINS. A Fully Blooded Felon member or associate’s failure to learn and memorize the rules could result in a violation and fine.

11. At R. MULLINS’ or the Commission’s direction, if a Fully Blooded Felon member or associate cooperated with law enforcement or failed to come to the aid of a fellow member, the punishment is death.

12. Fully Blooded Felon members and associates were required to abide by “omerta,” which is the code of silence.

13. R. MULLINS called and held mandatory meetings on a regular basis. R. MULLINS directed Commissioners to coordinate and set up the logistical aspects of the meeting. Fully Blooded Felon members or associates who missed meetings could be given a violation and have to pay a fine.

14. Fully Blooded Felon members and associates were occasionally required to pay dues. The dues were supposed to go towards paying an incarcerated member or associate’s commissary or helping their families financially. Fully Blooded Felon members or associates who failed to pay a due could be given a violation and have to pay a fine.

15. There were numerous cliques that comprised the Fully Blooded Felons, such as Fully Omerta, New Age Fully, the Fully Gun Gang, and others. Fully Blooded Felon cliques were often based on geographic location. Different Fully Blooded Felon members or associates

ran the different cliques. All of the cliques fell under the Fully Blooded Felon umbrella and answered to R. MULLINS.

16. Fully Blooded Felon members and associates used common phrases on social media to publicly identify themselves with the Enterprise. For example, Fully Blooded Felon members and associates commonly posted “626,” which signifies “FBF” or Fully Blooded Felons. Fully Blooded Felon members and associates commonly posted “IUWT,” which stands for “In Us We Trust.” Fully Blooded Felon members and associates used common hand signs meant to demonstrate their association to the Enterprise.

Purposes of the Enterprise

17. The purposes of the Enterprise included, but were not limited to, the following:

- A. Enriching the leaders, members, and associates of the Enterprise through, among other things, robbery, and illegal trafficking of controlled substances and firearms.
- B. Preserving and protecting the power, territory, reputation, and profits of the Enterprise through threats, intimidation, violence, and destruction, including, but not limited to, acts involving murder, kidnapping, robbery, assault, and other acts of violence.
- C. Promoting and enhancing the Enterprise and its members’ and associates’ activities.
- D. Keeping victims in fear of the Enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence.
- E. Attacking and retaliating against rival gang members through acts of violence, including, but not limited to, acts involving murder, assault, and other acts of violence.

Means and Methods of the Enterprise

18. Among the means and methods by which Defendants and other members and associates of the Enterprise conducted, and participated in the conduct of, the affairs of the Enterprise were the following:

A. Committing, conspiring to commit, attempting and threatening to commit acts of violence, including murder, kidnapping, robbery, and assault to protect the Enterprise's power, territory, and property.

B. To generate income, engaging in illegal activities under the protection of the Enterprise, including robbery, drug trafficking, weapons trafficking, and other illegal activities.

C. Fully Blooded Felon members and associates utilized different stash houses in the Cedar Estates. For example, for most of 2023, Fully Blooded Felon members used two apartments, Apartment 91 and Apartment 96, at the Cedar Estates in Cleveland, Ohio, to store controlled substances and firearms and to distribute different controlled substances to customers. Fully Blooded Felon members and associates shared keys and had access to both apartments and would often coordinate to facilitate different drug transactions.

D. Fully Blooded Felon members and associates congregated in front of the 28th Street Liquor Store and areas at or around the Cedar Estates to distribute controlled substances to customers.

E. To generate income and maintain power in the Ohio prison system, communicating with incarcerated Fully Blooded Felon members and associates to smuggle and distribute controlled substances and contraband.

F. Acquiring, distributing, carrying, and using firearms in acts of violence, retaliation, and protection against rival gangs.

G. Employing and using gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the Enterprise.

H. Perpetuating the Enterprise and to maintain its power, members and associates of the Enterprise committed and conspired to commit acts involving murder, kidnapping, and assault against individuals who posed a threat to the Enterprise, Fully Blooded Felon members or associates, or jeopardized its operations.

I. Prohibiting Enterprise members and associates from cooperating with law enforcement under threat of death.

J. To facilitate drug trafficking, Fully Blooded Felon members and associates traveled to Youngstown, Ohio, and elsewhere to obtain fentanyl pills that were shipped or transported back to the Cleveland area for resale.

K. To facilitate drug trafficking, Fully Blooded Felon members and associates used cellular phones and social media to coordinate and arrange for the sale and shipment of fentanyl pills and other drugs by phone calls, FaceTime calls, text messages, and other means.

The Racketeering Conspiracy

19. Beginning in or around January 2022, and continuing through on or about April 2, 2024, both dates being approximate and inclusive, within the Northern District of Ohio, and elsewhere, Defendants R. MULLINS, BURCHETT, ELLIOTT, HAMMOND, LEE, J. WILLIAMS, HORTON, CLEMONS, DARDEN, and E. WILLIAMS together and with other persons known and unknown to the Grand Jury, being persons employed by and associated with

the Fully Blooded Felons, an enterprise engaged in and the activities of which affected interstate and foreign commerce, knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that Enterprise through a pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering consisted of:

(a) multiple threats and acts involving:

(i) Murder, chargeable under Ohio Revised Code, Sections 2903.02, 2923.01, 2923.02, and 2923.03;

(ii) Robbery, chargeable under Ohio Revised Code, Sections 2911.01, 2911.02, 2923.01, 2923.02, and 2923.03;

(iii) Kidnapping, chargeable under Ohio Revised Code, Sections 2905.01, 2923.01, 2923.02, and 2923.03; and

(iv) Arson, chargeable under Ohio Revised Code, Sections 2909.03 and 2923.03; and

(b) multiple offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

20. It was further part of the conspiracy that each Defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Overt Acts

21. In furtherance of the conspiracy, and to affect the object and purposes thereof, Defendants R. MULLINS, BURCHETT, ELLIOTT, HAMMOND, LEE, J. WILLIAMS, HORTON, CLEMONS, DARDEN, E. WILLIAMS, and others known and unknown to the Grand Jury, committed and caused to be committed various acts, including, but not limited to, the following:

22. On or about January 6, 2022, Fully Blooded Felon member D.E. robbed Victim A at gunpoint at or around the Cedar Estates.

23. On or about June 30, 2022, R. MULLINS, BURCHETT, Adrionna Null (named but not charged in this count), Myeasha West (named but not charged in this count), Kyla Sharie Tyler (named but not charged in this count) kidnapped Victim B and held her captive for several days at or around the Cedar Estates.

24. On or about June 30, 2022, BURCHETT put a firearm to Victim B's head and threatened to kill her while R. MULLINS accused Victim B of being a "rat."

25. On or about June 30, 2022, Null, West, and Tyler assaulted Victim B at the direction of R. MULLINS.

26. From on or about June 30, 2022, to on or about July 6, 2022, R. MULLINS sexually assaulted Victim B.

27. From on or about March 30, 2023, to on or about December 5, 2023, R. MULLINS and BURCHETT had numerous phone and text message conversations in which they discussed Fully Blooded Felon hierarchy, leadership positions, logistics pertaining to the operation of stash houses, and other Enterprise-related matters.

28. From on or about February 10, 2023, to on or about September 28, 2023, R. MULLINS and DARDEN had numerous phone and text message conversations in which they used Fully Blooded Felon phrases and discussed Enterprise-related matters.

29. On or about April 12, 2023, R. MULLINS and DARDEN had a text message conversation. During the conversation, DARDEN texted R. MULLINS and expressed his excitement about a narcotics "deal," stating that he was going to have R. MULLINS,

BURCHETT, and N.M., a person known to the Grand Jury but not indicted herein, “laid back everybody chains all dat s**t . . . Da Fully Omerta Way.”

30. From on or about April 13, 2023, to on or about December 4, 2023, R. MULLINS and Rodney Linson (named but not charged herein) had numerous phone and text message conversations in which they discussed Fully Blooded Felon hierarchy, leadership positions, rules, violations, meetings, and other Enterprise-related matters.

31. From on or about April 13, 2023, to on or about November 13, 2023, R. MULLINS and HAMMOND had numerous phone and text message conversations in which they discussed Fully Blooded Felon hierarchy, leadership positions, rules, violations, meetings, and other Enterprise-related matters.

32. On or about May 26, 2023, R. MULLINS and Linson had a text message conversation about a mandatory Fully Blooded Felon meeting. R. MULLINS indicated that they would discuss Fully Blooded Felon rules at the meeting. R. MULLINS texted Linson that members would be fined \$3,500 if they missed the meeting and \$500 if they were late. Linson told R. MULLINS he would schedule the meeting for the following day.

33. From on or about May 31, 2023, to on or about November 27, 2023, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and others had a group text message conversation in which they discussed Fully Blooded Felon hierarchy, leadership positions, meetings, and other Enterprise-related matters.

34. On or about June 2, 2023, R. MULLINS and Linson had a text message conversation about a mandatory meeting for all Fully Blooded Felon Commission members and their “number 2s” to discuss gang structure, organization, and finances. R. MULLINS told Linson that LEE had to be at the meeting, as well. R. MULLINS asked if CLEMONS was going

to the meeting and stated that members would have to recite the “Fully 5” before and after the meeting.

35. From on or about June 21, 2023, to on or about September 24, 2023, R. MULLINS and E. WILLIAMS had numerous phone and text message conversations in which they discussed Fully Blooded Felon hierarchy, leadership positions, meetings, and other Enterprise-related matters.

36. On or about June 26, 2023, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and others had a group text message conversation in which they discussed having a meeting that day. Linson texted the group that Fully Blooded Felon members would need to speak one-at-a-time at the meeting, stating that “failure to do that results in automatic violation right then and there.” The participants discussed CLEMONS holding or running the meeting.

37. On or about June 27, 2023, R. MULLINS and BURCHETT had a text message conversation about having Fully Blooded Felon members serve on juries to “persuad[e] the jury or forcefully mak[e] em see it our way.” He further stated that if twelve people were going to have the “last say so [of] our life then at least a few people on the jury need to be ours or close to it.” BURCHETT replied, “I see.”

38. On or about July 10, 2023, R. MULLINS and BURCHETT had a text message conversation. R. MULLINS asked BURCHETT to instruct the enforcers that nobody is allowed to post or sell drugs in front of 2XX2 or 2XX4 Cedar Avenue because the buildings were being watched by law enforcement. BURCHETT responded, “Say less movement is dead.”

39. On or about July 10, 2023, R. MULLINS and E. WILLIAMS had a text message conversation in which they discussed a Fully Blooded Felon Commissioner not performing his functions as a Commission member.

40. From on or about July 18, 2023, to on or about July 20, 2023, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and others had a group text message conversation in which they discussed assaulting female Victim C for switching her gang affiliation from the Fully Blooded Felons to the Bloods.

41. On or about July 18, 2023, Linson texted in the same group message regarding how Victim C had joined the Bloods and disrespected a Fully Blooded Felon member named "Blaze," stating, "I'm tired of ppl playing with us period." Linson continued that they were going to "set up" Victim C before she went into the No Class Bar. The participants in the group text message decided to meet at the Cedar Estates at 5:30 p.m. on July 20, 2023, to travel together to attack Victim C.

42. On or about July 19, 2023, regarding the planned assault on Victim C, Linson texted the group that they needed to limit their text message conversations about the assault on Victim C and that they would need to talk over "FaceTime if we talking that type s**t now y'all." Linson then confirmed that they would meet the next day at 5:30 p.m. at the Cedar Estates.

43. On or about July 20, 2023, at approximately 4:28 p.m., BURCHETT texted in the group message stating that they were meeting at the basketball court on East 30th Street.

44. On or about July 20, 2023, around approximately 6:17 p.m., several vehicles occupied by Fully Blooded Felon members R. MULLINS, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and two other unindicted co-conspirators left the parking lot of the Cedar Estates in multiple vehicles. The convoy of vehicles drove to Interstate 90 and traveled westbound towards the No Class Bar, which was Victim C's location.

45. On July 20, 2023, around approximately 6:30 p.m., as the convoy of vehicles neared West 110th Street from Detroit Avenue, law enforcement attempted to conduct a traffic stop. Linson fled from law enforcement and was not apprehended. Two vehicles occupied by E. WILLIAMS and two other unindicted co-conspirators were stopped by law enforcement.

46. On or about July 20, 2023, CLEMONS texted in the group chat, writing "Abort." Linson then texted "Abort y'all." Participants in the group chat then discussed the circumstances surrounding a traffic stop conducted by law enforcement of E. WILLIAMS and two other unindicted co-conspirators.

47. On or about July 24, 2023, R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS and HAMMOND discussed Fully Blooded Felon hierarchy, leadership positions, and structure. R. MULLINS told HAMMOND to make ELLIOTT his number two. R. MULLINS stated that Linson is the "head commissioner" while CLEMONS is his "head enforcer."

48. From on or about July 25, 2023, to on or about December 5, 2023, R. MULLINS and LEE had numerous phone and text message conversations regarding LEE's role as an enforcer at the Cedar Estates as well as other Enterprise-related activities.

49. On or about July 30, 2023, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and others had a group text message conversation during which CLEMONS texted the group, "Happy fully day."

50. On or about August 1, 2023, R. MULLINS and BURCHETT had a text message conversation. During the conversation, R. MULLINS told BURCHETT to tell other Fully Blooded Felon members to avoid conducting narcotics transactions outside of the Cedar Estates, and that they should have drug customers "in and out." BURCHETT replied, "Say less."

51. On or about August 1, 2023, between approximately 5:58 p.m. and 7:50 p.m., R MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS admonished LEE for letting young individuals be on the “strip,” or grassy area adjacent to the Cedar Estates, because that was “y’all enforcer[’s] place.” R. MULLINS texted LEE that he was going to have HAMMOND go where LEE was and that LEE was too passive to be an enforcer.

52. From on or about August 11, 2023, to on or about November 29, 2023, R. MULLINS and ELLIOTT had numerous phone and text message conversations in which they discussed Fully Blooded Felon hierarchy, leadership positions, and other Enterprise-related matters.

53. On or about August 19, 2023, R. MULLINS and ELLIOTT had a text message conversation about Linson and ELLIOTT’S positions in the Fully Blooded Felon hierarchy. During the conversation, R. MULLINS texted ELLIOTT that ELLIOTT was Linson’s “number 2” and also in charge of the “fully gun gang” subset of the Fully Blooded Felons.

54. On or about August 24, 2023, R. MULLINS and HAMMOND had a text message conversation and discussed who was running the “new age fully” clique of the Fully Blooded Felons, as well as Linson and ELLIOTT’s respective “arm[ies].” During the conversation, R. MULLINS texted HAMMOND, “lil wee [DARDEN] must learn to respect da guys above him man.” HAMMOND replied, “Yea we gotta sit him dwn.”

55. On or about August 27, 2023, R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted DARDEN, “626 fbf my s**t” and DARDEN loved the text message and replied, “Naw fr [for real].”

56. On or about September 12, 2023, R. MULLINS, BURCHETT, CLEMONS, and an unidentified male attempted to rob Victim D at gunpoint at or around West 73rd Street in Cleveland, Ohio.

57. During the September 12, 2023, robbery, CLEMONS shot and killed Victim D.

58. On or about September 12, 2023, following the murder of Victim D, R. MULLINS, BURCHETT, CLEMONS, and the unidentified male fled the scene in a stolen Honda Pilot, which they later abandoned and burned at or around XXXX East 186th Street.

59. On or about September 18, 2023, R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted about a Fully Blooded Felon member owing a fine. R. MULLINS stated that he was letting HAMMOND and ELLIOTT know because the Commission needed to “answer” to Linson. HAMMOND agreed.

60. On or about September 22, 2023, R. MULLINS texted LEE that LEE was in violation for drinking alcohol while performing his duties as an enforcer.

61. On or about September 27, 2023, R. MULLINS texted ELLIOTT that he was creating a Fully Blooded Felons handbook, which would contain “the code and sanctions” for the gang, as well as each of the “categories” that included “organizing finances and structure.” ELLIOTT “loved” the text message.

62. On or about September 27, 2023, BURCHETT downloaded audio for a rap song created by R. MULLINS titled, “Im so fully.” During the song, R. MULLINS refers to himself as the “top rank” and admits to starting the Young Felons. R. MULLINS stated “Full Blooded Felon til I die, n***a.”

63. On or about September 28, 2023, R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS and DARDEN used Fully Blooded Felon phrases and terminology.

64. On or about October 3, 2023, BURCHETT, E. WILLIAMS, CLEMONS, Linson, and others had a group text message conversation. Linson texted the group that he believed there was a “mole” in their gang who discussed what happened at a meeting. E. WILLIAMS stated that only high-ranking members were at the meeting.

65. On or about October 10, 2023, DARDEN texted BURCHETT that he learned from the “greatest” by being with BURCHETT, and BURCHETT replied that “Omerta” was just part of their “way of life.”

66. On or about October 18, 2023, BURCHETT, E. WILLIAMS, CLEMONS, ELLIOTT, Linson, and others had a group text message conversation. During the conversation, CLEMONS texted the group regarding the October 12, 2023, arrest of HAMMOND, and requested that the group text participants contribute to paying HAMMOND’s bond. ELLIOTT then requested the participants in the group send money via Apple Pay for HAMMOND’s bond.

67. On or about November 5, 2023, R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS forwarded a text message to ELLIOTT that he had sent to Linson about ELLIOTT being Linson’s “number 2” and chairman of the “murder mafia.”

68. On or about November 5, 2023, Linson and BURCHETT had a phone conversation. During the conversation, BURCHETT and Linson discussed incarcerated Fully Blooded Felon member “Bone” [an unindicted co-conspirator] paying off a fine that resulted

from a violation. BURCHETT and Linson also discussed “Bone” providing suboxone strips to BURCHETT.

69. On or about November 9, 2023, R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS and ELLIOTT discussed Fully Blooded Felon members traveling to Youngstown, Ohio, to meet with Elijah Johnson [named but not charged in this count] to obtain fentanyl pills for re-sale.

70. On or about November 9, 2023, R. MULLINS, BURCHETT, ELLIOTT, and Tyree (named but not charged herein) had multiple phone and text message conversations with E. Johnson to arrange the purchase of fentanyl pills from E. Johnson for re-sale.

71. On or about November 9, 2023, E. Johnson distributed fentanyl pills to BURCHETT, HORTON, and Tyree.

72. On or about November 9, 2023, HORTON drove a white 2014 BMW, with BURCHETT and Tyree as passengers, when it was stopped by Streetsboro Police officers on Ohio State Route 14. Tyree possessed 55.09 grams of fentanyl pills, which E. Johnson had supplied.

73. On or about November 11, 2023, R. MULLINS and Linson had a phone conversation. During the conversation, R. MULLINS and Linson discussed the November 9, 2023, arrest of Devonte Johnson [“D. Johnson,” named but not charged in this count] and its implications for his role within the Fully Blooded Felons and the composition of the Commission.

74. On or about November 13, 2023, R. MULLINS and Linson had a phone conversation. R. MULLINS and Linson discussed unindicted coconspirator “Bone” joining the Commission.

75. On or about November 16, 2023, BURCHETT and DARDEN had a text message conversation in which they discussed selling a firearm.

76. On or about November 20, 2023, R. MULLINS and HAMMOND had a phone conversation about supplying narcotics to incarcerated Fully Blooded Felon members.

R. MULLINS stated that he wanted to find the youngest Fully Blooded Felon members without felony convictions to have them work as “correctional officers, social workers, case managers, [and] custodians” of the jails. HAMMOND replied, “Something, anything.” R. MULLINS responded that he had just told BURCHETT that he was going to “work on a police officer” to get “somebody on the inside.” HAMMOND responded, “Yeah.” R. MULLINS said, “We gotta think about it, man. The mob had everything they need!”

77. On or about November 28, 2023, R. MULLINS and ELLIOTT had a text message conversation about having J. WILLIAMS get an Airbnb for a Fully Blooded Felon meeting. During the conversation, R. MULLINS texted ELLIOTT that “[a]ll members capos commission enforcers generals and ranking official[s]” would need to be present and that he needed someone to reach out to the “Lorain family” to give their “ranking officials invites.”

78. On or about November 28, 2023, R. MULLINS and Linson had a text message conversation. During the conversation, R. MULLINS told Linson that ELLIOTT wanted Linson to add him to a group text message. Linson replied that he would make a new group chat to add the Commission members, including BURCHETT. R. MULLINS told Linson to add HORTON to the group text message as “treasury.”

79. On or about November 29, 2023, R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS stated, “I’m so fully” and ELLIOTT replied, “So fully so fully.”

80. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS, BURCHETT, and Tyree possessed a mixture of fentanyl and fentanyl analogue, and cocaine with the intent to distribute, along with digital scales, drug packaging materials, and multiple cellular telephones inside the Second, i.e., Apartment 91 of the Cedar Estates.

81. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS and BURCHETT possessed a Taurus, Model G3, 9-millimeter handgun, bearing serial number ABA253556, ammunition, body armor, and other assorted firearms parts and accessories inside the Second, i.e., Apartment 91 of the Cedar Estates.

82. On or about December 6, 2023, at approximately 6:00 a.m., BURCHETT, R. MULLINS, and LEE possessed a mixture of fentanyl and fentanyl analogue mixtures, buprenorphine (“suboxone”), methamphetamine, and cocaine with the intent to distribute, along with digital scales, drug packaging materials, and multiple cellular telephones inside the Third, i.e., Apartment 96 of the Cedar Estates.

83. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS and BURCHETT possessed an Arminius, .38 Special revolver, bearing serial number 024516; a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251; a Glock, Model 42, .380 caliber handgun, bearing serial number AFZY286; an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126; a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672; and a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO, along with ammunition, and other assorted firearms parts and accessories inside the Third, i.e., Apartment 96 of the Cedar Estates.

Notice of Special Sentencing Factors as to Count One

84. Beginning in or around January 2022, in the Northern District of Ohio, Eastern Division, and continuing to on or about the date of this Second Superseding Indictment, as part of the above-described racketeering conspiracy, Defendants MULLINS and BURCHETT, did combine, conspire, confederate, and agree, together and with others known and unknown, to knowingly and intentionally distribute or possess with intent to distribute at least 400 grams of a mixture or substance containing a detectable amount of fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

85. On or about September 12, 2023, in the Northern District of Ohio, Eastern Division, as part of the above-described racketeering conspiracy, Defendants R. MULLINS, BURCHETT, and CLEMONS, along with others known and unknown to the Grand Jury, while aiding and abetting each other, did purposely cause the death of another, namely Victim D, and caused the death of another, namely Victim D, as a proximate result of their commission or attempt to commit a crime of violence that is a felony of the first or second degree, to wit, aggravated robbery, in violation of Ohio Revised Code, Sections 2903.02, 2911.01, and 2923.03.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT 2

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,
21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C), (b)(1)(E))

The Grand Jury further charges:

86. Beginning in or around January 2022, and continuing through on or about April 2, 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RAVEN MULLINS, aka DUNNY, aka DUN (“R. MULLINS”); HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; ELIJAH JOHNSON, aka LOON (“E. JOHNSON”); DEMARCUS

ELLIOTT, aka MOO, aka FAST LANE; DONTEZ HAMMOND, aka DONNY; JEFFREY LEE, aka FATTY; JERRELL JONES-FERRELL, aka RUGA; DEVONTE JOHNSON, aka D NUT, aka NUT (“D. JOHNSON”); JEROME WILLIAMS, aka JAY (“J. WILLIAMS”); CHRISTEPHER HORTON, aka CAM, aka KILLA; DEEUNDRA PERKINS, aka DRIZZY; DEON BLACKWELL, aka WHITE BOY; ALEX DARDEN, aka LIL’ PEE WEE; and ESMOND WILLIAMS, aka RELLE (“E. WILLIAMS”), did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute fentanyl, a Schedule II controlled substance, methamphetamine, a Schedule II controlled substance, cocaine, a Schedule II controlled substance, cocaine base (“crack”), a Schedule II controlled substance, buprenorphine, a Schedule III controlled substance, and marijuana, a Schedule I controlled substance. As to R. MULLINS, BURCHETT, and E. JOHNSON, those Defendants conspired to distribute and possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A). As to ELLIOTT, LEE, J. WILLIAMS, and HORTON, those Defendants conspired to distribute and possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B). All Defendants conspired to distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, methamphetamine, cocaine, and cocaine base (“crack”), all Schedule II controlled substances, buprenorphine, a Schedule III controlled substance, and marijuana, a Schedule I controlled

substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and (b)(1)(E).

Manner and Means of the Conspiracy

87. It was part of the conspiracy that:

A. R. MULLINS, BURCHETT, E. JOHNSON, ELLIOTT, HAMMOND, LEE, JONES-FERRELL, D. JOHNSON, J. WILLIAMS, HORTON, PERKINS, BLACKWELL, DARDEN, E. WILLIAMS, and others were members of the Fully Blooded Felons, a branch of the Heartless Felons, which was a criminal street gang that was active in Northeast Ohio and in the Ohio prison system.

B. Fully Blooded Felon members and associates distributed pills containing fentanyl (“fentanyl pills”), methamphetamine, cocaine, buprenorphine (“suboxone”), marijuana, and other controlled substances in Northeast Ohio.

C. Fully Blooded Felon members used two apartments, Apartment 91 and Apartment 96, at the Cedar Estates in Cleveland, Ohio, to store controlled substances and firearms and to distribute different controlled substances to customers.

D. Fully Blooded Felon members referred to Apartment 91 as the “Second” and Apartment 96 as the “Third.”

E. Fully Blooded Felon members and associates shared keys and had access to both the Second and the Third and would often coordinate to facilitate different drug transactions.

F. Fully Blooded Felon members and associates directed customers to the Second and the Third to set up sales of different controlled substances.

G. Fully Blooded Felon members and associates stored firearms at the Second and the Third and shared them among members and associates. Fully Blooded Felon members used firearms to protect themselves and their controlled substances.

H. Fully Blooded Felon members and associates, including, but not limited to, JONES-FERRELL, D. JOHNSON, J. WILLIAMS, LEE, and PERKINS, used a grassy area immediately adjacent to the Cedar Estates to distribute controlled substances to customers at the direction of R. MULLINS and BURCHETT.

I. Fully Blooded Felon members and associates congregated in front of the 28th Street Liquor Store, which was adjacent to the Cedar Estates, to distribute controlled substances to customers.

J. E. JOHNSON travelled to the Southwest United States, including Texas and Arizona, to obtain kilogram quantities of fentanyl pills for distribution in Northeast Ohio.

K. E. JOHNSON supplied kilogram quantities of fentanyl pills to Fully Blooded Felon members and associates in Northeast Ohio, including BURCHETT, ELLIOTT, and HORTON, who further distributed the fentanyl pills to customers in Northeast Ohio.

L. Fully Blooded Felon members and associates, including, but not limited to, BURCHETT, R. MULLINS, and BLACKWELL, operated a drug smuggling and distribution ring inside numerous Ohio state prisons and federal detention centers.

M. Fully Blooded Felon members and associates coordinated with incarcerated members and associates to smuggle suboxone “sheets,” “strips,” and “books” containing buprenorphine, as well as other contraband into different Ohio state prisons and federal detention centers.

N. Fully Blooded Felon members and associates, including, but not limited to, R. MULLINS, BURCHETT, LEE, and HAMMOND possessed and used firearms in furtherance of drug trafficking and to protect drugs and proceeds of drugs.

O. Fully Blooded Felon members used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages and social media messages to communicate.

P. When using cellular telephones and text messaging to conduct drug trafficking activity, Fully Blooded Felon members and associates used slang terms, street terminology, and code words and phrases to obscure and disguise the true nature of their activities and the true meaning of their conversations.

Acts in Furtherance of the Conspiracy

88. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

89. On or about February 10, 2023, at approximately 2:06 p.m., R. MULLINS texted DARDEN, “Just so yu no I’ll giv you 100 of em for 300 [100 fentanyl pills for \$300] my g yu still gone bubble crazy lik forreal but that’s if yu want it.”

90. On or about February 11, 2023, between approximately 10:45 a.m. and 10:54 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted DARDEN, “I got ten [fentanyl pills] in a pack for 70 to party pack for da bros ecrybody else pay 15 20a demo.” DARDEN replied, “Big bet.”

91. On or about February 19, 2023, between approximately 11:40 a.m. and 11:51 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation,

R. MULLINS texted, "Aye you a III L put 100 together matter fact 150 [100-150 fentanyl pills] I got y'all to where y'all can party and sell em and knock heads off but I hit this sweet play y'all right now like y'all gone smile all week." R. MULLINS continued, "I'm taking 150 it's a Dunn deal man on life." DARDEN responded, "I just told LL bra bout the deal 2 waiting on him hit me bacc."

92. On or about February 21, 2023, between approximately 4:40 p.m. and 4:41 p.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted, "Dwn to the last twenty to the weekend," and DARDEN replied, "I'm f***ed up rn I just hadda pay for the kids daycare for the month imma let mase kno." R. MULLINS responded, "Sayless."

93. On or about March 15, 2023, between approximately 10:00 a.m. and 10:03 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted, "It got em," and "Dm . . . him . . . Nu [BURCHETT] to." DARDEN asked, "What's Nu [BURCHETT] #," and R. MULLINS sent BURCHETT's phone number to DARDEN. DARDEN texted, "Goodlooking I'm finna text him now."

94. On or about March 25, 2023, between approximately 3:09 p.m. and 6:21 p.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted, "Have yu been Hollin at loon [E. JOHNSON]." DARDEN responded, "Hell yea Ian finna miss it & naw he read my messages & ain't reply." R. MULLINS replied, "Call him . . . Now." DARDEN replied, "I'm finna call him . . ." and "He aint' answer." R. MULLINS texted, "Ok we gone see hi. [E. JOHNSON] Tonight he prolly setting up." R. MULLINS texted, "Mss as ke sure yu there tonight bro." DARDEN replied, "You said make

show I be there?” R. MULLINS replied, “Yup,” and texted DARDEN to bring him Chinese food and said he would “bless yu wit blues [fentanyl pills].”

95. On or about March 29, 2023, between approximately 10:02 a.m. and 10:11 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, DARDEN texted, “I was gon come grab sun yea’s from you.” R. MULLINS responded, “Forsure,” and DARDEN replied, “Bet Imma text wen I’m outside.” R. MULLINS texted, “Bro we playing it smooth da camera don’t need to see both of us just park by the store and walk to the building the lot so fishey.” R. MULLINS asked, “How many you wanted,” and DARDEN replied, “Oh s**t I ain’t know . . . I got you doe.” R. MULLINS responded, “I’m case I’m sh***ing I can have em on the table already reez [J.M.] up here wit me.” DARDEN replied, “6 of em . . . & bet.” R. MULLINS texted, “Ok bring me [\$]60 I got 13 [fentanyl pills] for yu dat way yu strapped for later these pressure so yu ain’t gotta go cop crazy.” DARDEN replied, “Ight.” R. MULLINS responded, “Dats cool? I’m just tryan save my young boy money.” R. MULLINS texted, “N***a if I got it don’t never worry bout paying full price and I’m a always look out like I’m pose to.”

96. On or about April 3, 2023, between approximately 2:12 a.m. and 2:40 a.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation, R. MULLINS texted, “I might put theeze on on strip duty due ti the fact he a general under killa [HORTON] seat but I don’t need him for S**t physical but he been a n***a playng da strip but I’m speaking in terms of security making sure dat butch getting ram how it pose to wit a lil help but he gotta find out wat he wanna do for the time being.” BURCHETT replied, “Say less.”

97. On or about April 6, 2023, between approximately 11:01 a.m. and 11:04 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation,

DARDEN texted, "Wya big bra," and R. MULLINS responded, "Second." DARDEN replied, "Bet I'm dropping dukes off to da spot den im finna pull up." R. MULLINS texted, "Ok." DARDEN texted, "I got 40\$ for you." R. MULLINS texted, "I'm dwn to the last 20 [fentanyl pills] I git nine for you." DARDEN responded, "That cool." R. MULLINS replied, "I kno wen I got get da load you loaded." DARDEN texted, "Sayless Imma park in tune lot & walk . . . threw."

98. On or about April 11, 2023, between approximately 5:02 p.m. and 9:02 p.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, R. MULLINS texted, "I got 50 [fentanyl] pills for you and Lonnie bring me 100 days [\$]2 a pill just for y'all y'all get twenty five a piece get high and make all y'all money back and sum." DARDEN texted, "I was just finna ride through Sayless and we riding w 4 dracs [AK-47s]."

99. On or about April 13, 2023, between approximately 3:45 p.m. and 4:17 p.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, DARDEN texted, "You ina hood big bro," and R. MULLINS replied, "Yup but nu [BURCHETT] got da blues [fentanyl pills] on him." DARDEN responded, "He down their...I just talked to em . . . I'm finna come down." R. MULLINS responded with a checkmark emoji.

100. On or about April 16, 2023, between approximately 10:27 a.m. and 10:29 a.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation, R. MULLINS texted, "We got da other spot wine gotta clean . . . I'm a get three keys ne you [BURCHETT] and reez [J.M.] got copy rights."

101. On or about April 20, 2023, between approximately 1:18 p.m. and 3:08 p.m., R. MULLINS and DARDEN had a text message conversation. During the conversation,

DARDEN asked, “Way,” and R. MULLINS replied, “Second.” DARDEN responded, “Coming from da ak [Akron, Ohio] was finna grab a couple p’s from you if you ona move I ah wait.”

R. MULLINS texted, “I’m dwn.”

102. On or about May 2, 2023, between approximately 9:46 a.m. and 10:08 a.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation, R. MULLINS texted, “Aye look dat N***a loon [E. JOHNSON] called and said come out there but I gotta collect a few more people owe me and o [Cedar Estates] cashed out on drugs yesterday I’m going to load up on da pills but due he said he got that. I guess wat I’m saying have like a dollar or two to the side in see I ain’t got wat I owe but call dat n***a to be sure if it’s dat I mean yu will kno how to tell if he got dat.” BURCHETT replied, “He [E. JOHNSON] said he on his way to us.”

103. On or about June 16, 2023, at approximately 4:56 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “Got 300 right now for you but look I need da sane demo on da Caine [cocaine] . . . I’m here though.” HAMMOND replied, “Bet.”

104. On or about June 17, 2023, between approximately 1:52 p.m. and 3:35 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “Oh yeah no more Cain,” and HAMMOND replied, “Yea I got some but I’m sliding at 7.” R. MULLINS responded, “Im on my way right now . . . I’m dwn I git 185 rn.” HAMMOND replied, “Sayles give me like 30 I’m leaving dukes spot.” R. MULLINS texted, “K,” and HAMMOND responded, “Pulling up.”

105. On or about June 27, 2023, J. Mullins [a person known to the Grand Jury but not charged herein] and JONES-FERRELL had a text message conversation. During the

conversation, J. Mullins texted, “Tryna show you that new thant [sic] I got for us.” JONES-FERRELL replied, “What new thang.” J. Mullins responded, “Gun.” J. Mullins said, “Dun [R. MULLINS] spot.”

106. On or about June 28, 2023, JONES-FERRELL and J. Mullins had a text message conversation. During the conversation, JONES-FERRELL texted, “He [R. MULLINS] got a AR in dat b***h.” J. Mullins replied, “I know.”

107. On or about July 3, 2023, between approximately 9:26 p.m. and 9:30 p.m., R. MULLINS and E. WILLIAMS had a text message conversation. During the conversation, E. WILLIAMS texted, “Wats the ticket?” and R. MULLINS replied, “Wat yu tryna spend cuz it ain’t gott abe all cheese feel me . . . I’m a go off yu cuz I’m not gone tax yu at all.” R. MULLINS continued, “I paid 350 for it but I can I go for two Ballys [1/8th ounce of cocaine] and 150.” E. WILLIAMS responded, “I gotta go back in the lab.” R. MULLINS replied, “Sayless yu can come grab it though,” and E. WILLIAMS texted, “Say less.”

108. On or about July 4, 2023, between approximately 2:26 p.m. and 2:29 p.m., R. MULLINS and E. WILLIAMS had a text message conversation. During the conversation, R. MULLINS texted, “Bra I’m tryna get money out by Friday or mine day his s**t 5 bands [\$5,000] but in a give da bud man three he gone pay da rest wen he out I need him out so look I might need to flip more Caine [cocaine] I’ll pay yu back I just gotta get him out I git triple fulky and Greg putting in yo but I’m hussle these few days and he should be out.” E. WILLIAMS replied, “I tryan grab some now and go in the lab but bru hot it’s his son bday so it might not be til tomorrow.”

109. On or about July 4, 2023, between approximately 9:52 p.m. and 10:15 p.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation,

R. MULLINS texted, "I got these cut up 5 grams [of cocaine] for [\$]175 if yu staying or tell fatty [LEE]." BURCHETT responded, "You left," and R. MULLINS replied, "Nope . . . She bout to pull up though." BURCHETT replied, "I still got Cain [cocaine] but I'm staying down" R. MULLINS responded, "Sayless it's a enough in da bag way more then 150 worth." BURCHETT texted, "You gone give it to me for the 150 in let me do my thing I'm gone halla." R. MULLINS replied, "I'm just collecting before I leave from n***s but dis all the dop left here reez [unindicted coconspirator] leaving so Sayless."

110. On or about July 8, 2023, between approximately 1:23 p.m. and 1:34 p.m., R. MULLINS and E. WILLIAMS had a text message conversation. During the conversation, E. WILLIAMS texted, "I gotta collect some cheese then go in I f**ked some cheese up light way after I coped those demo's . . . I'm just tryna get at least 4 cause on or two ain't enough." R. MULLINS replied, "Ok I got like 3 cash." E. WILLIAMS responded, "Say less I can come grab it and go it for u."

111. On or about July 10, 2023, between approximately 5:38 p.m. and 6:57 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, "450 cash right now just touch dwn," and HAMMOND replied, "Sayless swing yo way in a sec." R. MULLINS texted, "Ok my g reez [unindicted co-conspirator] tryna cop to try to swing through fir dem peophe pop back up yu no I see Dey as to much I'll be in Akron somewhere." R. MULLINS continued, "I still got Cain [cocaine] but yu know I can use sone more and it might be the whole price wen yu get here if I hit sone plays." HAMMOND replied, "I gotta run back up on the low bag but I'm Holla at u when I touch . . . On my way dwn now."

112. On or about July 11, 2023, at approximately 10:14 p.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation, BURCHETT texted, “We’re reez [J.M.] . . . He not picking up.” R. MULLINS replied, “He on second.”

113. On or about July 20, 2023, between approximately 4:15 p.m. and 4:23 p.m., R. MULLINS and E. WILLIAMS had a text message conversation. During the conversation, R. MULLINS texted, “My g make sure it on time bro scrap [Linson]. It playing wit n***as who don’t show up.” E. WILLIAMS responded, “Say less.”

114. On or about July 27, 2023, between approximately 2:12 p.m. and 3:44 p.m., R. MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS, “Yu left,” and LEE responded, “Yea I’m bouta come back.” R. MULLINS continued, “Fat back yu know I ain’t rushing yu but I’m bout to get more Cain [cocaine] wen Donny [HAMMOND] pull up and yu kno I’m a throw it right back at yu.”

115. On or about July 28, 2023, between approximately 2:30 p.m. and 9:24 p.m., R. MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS texted, “Man fatty [LEE] how you just miss all these plays [drug customers] I been sleep since y’all left dude I ain’t snwe no knocks I’m thinking you out there like wtf I could of opened my dope how da f**k we pose to eat if I’m ignoring plays thinking you out ther eman ain’t you one of da ones in charge of da block so I sent plays to non fulky members n***a I’m salty as f**k cuz everyone you leave yu miss money and we could if been on a whole new batch wit way more grams for da same price stupid get money . . . but yo ass lose focus dealing wit real plugs timing is everything.” LEE responded, “Ight.”

116. On or about July 30, 2023, at approximately 10:43 a.m., E. WILLIAMS texted R. MULLINS, “Happy gday my g as well as fully day”

117. On or about August 3, 2023, between approximately 7:47 p.m. and 7:49 p.m., R. MULLINS texted LEE, "I still owe Donny [HAMMOND] so bro don't hood me up dats more then Enough my g grind all night . . . I owe Donny five but I don't mind paying him a couple days if but I be tryna get to the next pack."

118. On or about August 4, 2023, between approximately 10:17 a.m. and 12:08 p.m., BURCHETT and DARDEN had a text message conversation. During this conversation, DARDEN texted, "I'm tryna get a power deal on da blues [fentanyl pills] if you got sun . . . I need like 50-60." BURCHETT replied, "Alright."

119. On or about August 4, 2023, between approximately 7:39 p.m. and 7:44 p.m., R. MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS texted, "Where rug [JERRELL-JONES] at wit da bag he ain't hitting no plays," and LEE responded, "Idk." R. MULLINS replied, "SMH."

120. On or about August 4, 2023, between approximately 9:12 a.m. and 9:14 a.m., R. MULLINS and DARDEN had a text message conversation. During the conversation, DARDEN texted, "Blues [fentanyl pills]?" R. MULLINS responded, "Noody Bo [BURCHETT]." DARDEN replied, "Ok ok send #."

121. On or about August 11, 2023, at approximately 7:36 p.m., R. MULLINS texted E. WILLIAMS, "Bra it's slow on da Caine [cocaine] plays and I gotta handle this note [drug customer] in tonight by twelve dis butch ain't doing s**t . . . It never been this slow on da o [Cedar Estates]."

122. On or about August 15, 2023, between approximately 1:43 p.m. and 4:35 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, "You already kno. I say about 430 dis from yesterday should be doubled

money wise.” HAMMOND replied, “Bet,” and R. MULLINS texted, “I’m here in da building.” HAMMOND asked, “U need me before I go,” and R. MULLINS replied, “I really do and I need yu to bring chops.” R. MULLINS sent a photograph of cocaine to HAMMOND. HAMMOND replied, “Sayless.” R. MULLINS continued, “Wen yu chop it it don’t get shaky this fatty [LEE] mess lol he say he trying to bring me a dollar later today but only got like one 60 yu kno I been wit da baby but cash still flowing it’s just slow but cone get wat I got my g dis shut don’t stop out out here for a while . . .” R. MULLINS texted, “Theeze need sone Cane [cocaine] to he trying to coo some.” HAMMOND responded, “Pulling up.” R. MULLINS texted, “He got 250 . . . Off camera.”

123. On or about August 17, 2023, at approximately 4:10 p.m., R. MULLINS texted HAMMOND the phone number belonging to ELLIOTT.

124. On or about August 18, 2023, between approximately 12:02 p.m. and 12:13 p.m., R. MULLINS and BURCHETT had a text message conversation. During the conversation, R. MULLINS texted, “Fatty ain’t allowed to huddle on da strip no more only in da jets no more front line.” BURCHETT replied, “Say less it so crazy I was just ready to send that n***a a text hoping in his ass.”

125. On or about August 25, 2023, between approximately 5:09 p.m. and 6:18 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “Yu f**k wit da blues [fentanyl pills] right? Man we got it . . .” HAMMOND replied, “That ain’t my lane but I can c whats up long as they look official.” R. MULLINS responded, “My g im just saying . . . Man my g we gotta sit down as well he got plays [drug customers] out here cash on n***as we speaking bout it all see he wanted to sit down to date y I ain’t left yet but my g it’s on.” HAMMOND replied, “Fasho.”

126. On or about August 27, 2023, between approximately 11:45 a.m. and 6:20 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, "My g don't trip I'm bout to get these blues [fentanyl pills] wen he get back it's up and we getting it off the top." HAMMOND replied, "U already kno bra sayless." R. MULLINS continued, "I'm on my way in like a hour fatty [LEE] taking this he only git 100 s**t scratch that I'm just give yu the 4 zips I got for dat demo more for yu I need action anyway but taking the 4 up to yu I had two cash" HAMMOND responded, "Sayless I got you . . . get that 100 from that n***a I need Dat . . . It's cool ima sell the bud I got some action 4 u." R. MULLINS replied, "Got yu but look start finding out who need perk 30s [fentanyl pills] it ain't yo lane but we eat together this s**t to sweet . . . I'm on the freeway as we speak my g and I'll be there So ima give all four of em I just need some action to where I can call in a few days feel me . . . But it's going one way or another." HAMMOND texted, "I got u." R. MULLINS texted, "Sayless be there in a few," and HAMMOND texted his address to R. MULLINS.

127. On or about September 4, 2023, between approximately 2:25 p.m. and 3:35 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, "Aye I'm a be at da trap soon pull up on me at like 4 . . . I know fir a fact I got 400 on da table to but ain't nobody there rn I'll be soon." HAMMOND texted, "Freeway," and R. MULLINS replied, "Ok."

128. On or about September 6, 2023, BURCHETT and E. JOHNSON had a text message conversation. E. JOHNSON said, "I'm in Cleveland I need a 3.5 [quantity of drugs]." BURCHETT asked, "Who dis?" E. JOHNSON replied, "Loon." BURCHETT asked, "Where you at?" E. JOHNSON replied, "Tyрна find a hotel!" E. JOHNSON said, "Wen I get a room

can u have someone bring it?” and “I’ll pay for ride n weed.” Later E. JOHNSON said, “[§]100 for 3.5 [grams of drugs].” BURCHETT said, “Here I come.”

129. On or about September 12, 2023, BURCHETT and Customer 1 had an Instagram direct message conversation. During the conversation, Customer 1 asked, “You got some weed?” BURCHETT responded, “Apple Pay” and “The Second [Apartment 91 at the Cedar Estates].”

130. On or about September 14, 2023, between approximately 8:46 p.m. and 8:48 p.m., R. MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS texted, “Yu got pole [handgun].” LEE responded, “Nahh it’s up there.” R. MULLINS texted, “My pole,” and “Only the 380 up here.” R. MULLINS continued, “Where da crime joint at,” and LEE responded, “It’s inna bag nu [BURCHETT] got it.”

131. On or about September 21, 2023, at approximately 1:13 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “175 cash right now,” and HAMMOND replied, “Bet.”

132. On September 22, 2023, between approximately 5:55 p.m. and 5:56 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “My g it was 175 it’s lil under . . . I’m still low on Caine [cocaine] and unk bringing me my bread for da x Saturday !!! I literally got like 4 stones left . . .” HAMMOND replied, “Sayless.”

133. On or about September 24, 2023, BURCHETT and M.B. [a person known to the Grand Jury but not indicted herein] had an Instagram direct message conversation. During the conversation, BURCHETT and M.B. discussed enlisting individuals as correctional officers to smuggle drugs and contraband into the Northeast Ohio Correctional Center. M.B. asked, “Do

you kno anyone who tryna get a bag? They gotta come be a co [correctional officer] here in Youngstown they hiring bad. If so ima pay for them a rental to get here for like a month or two. But I need them to bus moves for me. Im give ‘em 5bands every move. Plus they already paying them good money here so it’s gon be worth it. A couple months here they gone be turnt!” BURCHETT asked, “How old they gotta be?” M.B. replied, “18.” Later in the conversation BURCHETT said, “Omm say less what they gotta do,” then asked, “What’s the website.” M.B. replied, “Corecivic.com,” then said, “They gotta apply.”

134. On or about September 26, 2023, at approximately 2:17 p.m., BURCHETT sent an Instagram message to A.C. [a person known to the Grand Jury but not indicted herein]. BURCHETT sent a message with his telephone number and said, “Call me.”

135. On or about September 26, 2023, at approximately 2:17 p.m., BURCHETT and A.C. spoke on the telephone for approximately 2 minutes and 23 seconds.

136. On or about September 26, 2023, at approximately 2:21 p.m., BURCHETT sent an Instagram message to A.C. stating, “corecivic.com.”

137. On or about October 2, 2023, between approximately 2:37 p.m. and 6:53 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, “Got 250 right now to my g . . . Need action.” HAMMOND replied, “Bet,” and R. MULLINS responded, “I need it before da meeting to cuz.” HAMMOND texted, “I ain’t driving righnow . . . I’m waiting on a whip [vehicle].” R. MULLINS texted, “If yu pull up and I ain’t hear the money on the table I gotta go address done shut wit unk phone might not be wit ne just leave da action on the table it’s gone be cash on tab fir you.” HAMMOND replied, “OK.” R. MULLINS continued, “Tell noody [BURCHETT] cuz he got da key in a be back sap” HAMMOND responded, “Sayless . . . On my way.”

138. On or about October 9, 2023, between approximately 10:07 a.m. and 11:33 p.m., R. MULLINS and HAMMOND had a text message conversation. During the conversation, R. MULLINS texted, "I git three on table I had da whole thing yesterday . . . I got Caine [cocaine] left just nit enoguht don't you hit action?" HAMMOND responded, "Sayless my g." R. MULLINS texted, "I can come yo way." HAMMOND texted R. MULLINS his address. R. MULLINS texted, "On my way," and "Outside."

139. On or about October 10, 2023, between approximately 1:53 p.m. and approximately 4:41 p.m., Linson and E. JOHNSON engaged in a text message conversation. Linson said, "Yoooo," then asked, "ADDRESS." E. JOHNSON replied, "XXX Warren," then said, "XXX Samuel come here." Linson replied, "Ok." Later, E. JOHNSON said, "?" Linson responded, "They [BURCHETT and ELLIOTT] on they way Brody." E. JOHNSON said, "Ok." Linson said, "Bro [BURCHETT and ELLIOTT] they in route to you." Linson said, "Noodles [BURCHETT] and moo [ELLIOTT] coming."

140. On or about October 12, 2023, HAMMOND possessed 61.4 grams of cocaine with the intent to distribute.

141. On or about October 12, 2023, between approximately 1:49 p.m. and 1:53 p.m., R. MULLINS and LEE had a text message conversation. During the conversation, R. MULLINS texted, "Bro next time yu leave yo sister at da spot we gone fall out N***a I'm not there she can't come in my shut unless I say so n***as . . ." LEE responded, "Ight big bru my fault she was post to go to Ivy house."

142. On or about October 13, 2023, at approximately 7:33 p.m., JONES-FERRELL and BURCHETT had a phone conversation. During the conversation, JONES-FERRELL said, "Little bro about to bring you a key," at "the Second [Cedar Estates, Apartment 91]."

143. On or about October 14, 2023, at approximately 1:38 p.m., BURCHETT and Customer 2 had a phone conversation. During the conversation, Customer 2 asked to purchase marijuana. BURCHETT told Customer 2 that he would leave marijuana at “the Second.”

144. On or about October 14, 2023, at approximately 1:40 p.m., BURCHETT and Customer 2 had a phone conversation. During the conversation, Customer 2 asked, “Ok, now where did you say it was at?” BURCHETT replied, “Ask Dun [R. MULLINS], he know where they at? Right there next to the door.” Customer 2 responded, “He [R. MULLINS] got it, he got it.”

145. On or about October 16, 2023, at approximately 10:17 a.m., PERKINS texted R. MULLINS, “Moo [ELLIOTT] said what’s killa [HORTON] number.” R. MULLINS responded, “Tell moo call killa.” PERKINS replied, “Send the number.” R. MULLINS texted PERKINS contact information for HORTON.

146. On or about October 18, 2023, between approximately 4:32 a.m. and 4:40 a.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, “Call loon [E. JOHNSON] tell him dats on the market but do that when fatty [LEE] not around but do it sap bro call scrap [Linson] and tell him let da homies know we need 350for bra it’s coming right back we got to many high ranks bro.” ELLIOTT responded, “Need numbers,” and R. MULLINS sent E. JOHNSON’s contact information to ELLIOTT.

147. On or about October 20, 2023, PERKINS was present at or around the Cedar Estates. An unknown male that was associating with PERKINS conducted suspected hand-to-hand drug transactions in the immediate vicinity of where PERKINS was standing.

148. On or about October 23, 2023, at approximately 5:36 p.m., BURCHETT and ELLIOTT had a phone conversation. During the conversation, BURCHETT said, “I got a play

[customer] coming over there he in a wheelchair. I'm gonna call you when he downstairs."

ELLIOTT asked, "What he got?" BURCHETT responded, "Like, 15 or 20."

149. On or about October 24, 2023, between approximately 8:15 a.m. and 8:17 a.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, "Bra yu need to ask dat n***a loon [E. JOHNSON] who he need took dwn I told yu he cash a few demos out there he need took care of he got cash he been said that." ELLIOTT replied, "We had that talk like 3times.he keep saying he gotta find out where that hidden at."

150. On or about October 25, 2023, D. JOHNSON possessed a firearm with a grey handle and extended magazine, as depicted in a photograph posted to Instagram.

151. On or about October 25, 2023, at approximately 12:15 p.m., BURCHETT and an unknown man had a phone conversation. During the conversation, the unknown man asked, "You got any of those sheets [suboxone sheets]?" BURCHETT responded, "Yeah, hell yeah, they want, like, 150 for them bs." BURCHETT continued, "Hell yeah, that's why I ain't been f*****g around. They say it's gas smoke [strong]" The unknown man asked, "Man, s**t. You got some more strippers [suboxone strips]?" BURCHETT asked, "Aww, like, how many?" The unknown man said, "Like, 50 or 100?" BURCHETT replied, "I'm going to have to go see. I'm about to shoot to the spot, I gotta count those b*****s and see how many I got though . . . I'm going to call my n***a with the sheets and see if prices have changed and see what the f**k is going on, though."

152. On or about October 25, 2023, at approximately 1:03 p.m., BURCHETT and Customer 2 had a phone conversation. During the conversation, Customer 2 said, "I need some

weed [marijuana], man.” BURCHETT said, “Go on the Second and tell Dunny [R. MULLINS] to give you some weed.”

153. On or about October 25, 2023, at approximately 2:41 p.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, “No Caine [cocaine] still,” and ELLIOTT responded, “SMH [shaking my head].”

154. On or about October 25, 2023, during several telephone calls, BURCHETT and an unknown woman discussed BURCHETT purchasing suboxone sheets from the unknown woman.

155. On or about October 26, 2023, at approximately 5:02 p.m., BURCHETT and Customer 3 had a phone conversation. During the conversation, Customer 3 said, “Beater [N.M.] told me to see if something was on the Second . . . some boy [heroin].” BURCHETT replied, “Like what?” Customer 3 said, “20.” BURCHETT said, “Go on ‘the Second,’ knock on the Second” and “Stop talking like that on my phone, too.”

156. On or about November 1, 2023, at approximately 12:28 a.m., BURCHETT and R. MULLINS had a phone conversation. During the conversation, BURCHETT said, “Hey throw the key to the Second up here.” R. MULLINS replied, “Alright we bout to, uh, where Moo [ELLIOTT] at? I’m ‘bout to, uh . . .” BURCHETT said, “We ‘bout to come down, he [ELLIOTT] said you got his key.” R. MULLINS replied, “Alright, yeah, I got Moo [ELLIOTT] key.” BURCHETT said, “Yeah, tell that n***a, throw the key up here, just in case I leave.”

157. On or about November 2, 2023, at approximately 12:53 p.m., BURCHETT and J. WILLIAMS had a phone conversation. During the conversation, BURCHETT asked, “Hey, you got my key?” J. WILLIAMS said, “Yup, I got your key. Oh, where you at?” J. WILLIAMS said, “I’m in the trap upstairs [Cedar Estates, Apartment 91].”

158. On or about November 3, 2023, at approximately 7:33 p.m., BURCHETT and ELLIOTT had a phone conversation about a pill press. ELLIOTT said, "I just got off the phone with your guy . . . Killa [HORTON]." BURCHETT asked, "What he talk about?" ELLIOTT replied, "He talking about that press move tomorrow. You hear me?" BURCHETT said, "Oh, tomorrow?" ELLIOTT continued, "He [HORTON] talking about she gonna show him the spot, and it's up to you, me, and Dunn [R. MULLINS] after that." BURCHETT said, "Say less." ELLIOTT said, "But what I just told Dunn [R. MULLINS], what I'm telling you man, us three."

159. On or about November 5, 2023, at approximately 3:15 p.m., LEE and BURCHETT had a phone conversation. During the conversation, LEE asked, "Where you at n***a?" and BURCHETT replied, "the Third." LEE said, "Alright, open the door."

160. On or about November 5, 2023, BURCHETT, D.B., and Unindicted Coconspirator A had several three-way phone calls. During the conversation, BURCHETT spoke with D.B. and then merged Unindicted Coconspirator A into the phone conversation. BURCHETT, D.B., and Unindicted Coconspirator A discussed a fine that D.B. was required to pay in order to be promoted to "Capo" in the Fully Blooded Felons.

161. On or about November 5, 2023, at approximately 12:00 p.m., D.B. and BURCHETT had a phone conversation. During the conversation, D.B. and BURCHETT discussed smuggling suboxone sheets into a prison. D.B. said, "Gas [potent], I ain't gonna lie. Listen, now listen, I just bought 48 sheets [suboxone sheets] from him [drug supplier], um, I just bought 50 sheets from him last week. Now I'm waiting on these to land. These about to land, uh, either today or tomorrow or something, but look, that dude [supplier] be flying. That n***a was sending straight gas to me." BURCHETT responded, "Yeah, that's the s**t that I'm getting, that's the same s**t. They in the same." D.B. replied, "Oh, say no more then. Say no more. So

I know, 'cause when I buy the sheets from him, he be having them, they be book papers, too. So them n****s, that's what they do. They specialize in them books." BURCHETT said, "Oh yeah, so we should be in there. I should be able to get my n***a, for sure." D.B. said, "Oh yeah, for sure they gonna know what's going on with the books. So look, you just tap in with bruh along with your n***a, seeing if you talking about you might be able to get, you know, if a n***a spend about 10,000, you might be able to get some way better love. You know how it is if n****s be family."

162. On or about November 6, 2023, at approximately 3:18 p.m., BURCHETT and J. WILLIAMS had a phone conversation. During the conversation, BURCHETT asked, "You already grab them blue [fentanyl pills]? You grab them blues already?" Later BURCHETT asked, "What you about to get them for?" J. WILLIAMS replied, "Half for a double of 50, and half for 125."

163. On or about November 6, 2023, at approximately 4:09 p.m., an unknown man and BURCHETT had a phone conversation. The unknown man said, "I'm about to pull up, though. I'm coming down, um, mother f****n', umm, what is it?" BURCHETT interjected, "Don't you know that building I be in . . . the one right there that I be selling [drugs] from." The unknown man asked, "Ah, you want me to come upstairs?" BURCHETT replied, "Yeah, come all the way to the third floor [Cedar Estates, Apartment 96]." The unknown man said, "Oh, that's the new spot?" BURCHETT said, "Yeah, yep."

164. On or about November 6, 2023, at approximately 6:51 p.m., BURCHETT and LEE had a phone conversation. During the conversation, BURCHETT asked, "Hey, you still down there?" LEE replied, "Yeah, I'm in the car, right here, in the car on 30th [and Cedar Avenue]." BURCHETT said, "I need you to do me a favor, I'm a get you back as soon as I

come back down . . . 2 grams [quantity of drugs], I'll get you back when I come back down."

LEE asked, "Where she at? In the spot?" BURCHETT replied, "Yeah." LEE said, "I'll tell you when to tell her to come outside."

165. On or about November 6, 2023, at approximately 6:57 p.m., LEE and BURCHETT had a phone conversation. During the conversation, LEE said, "Yeah, tell her to come outside." BURCHETT asked, "Where you at?" LEE said, "I'm in front of the spot . . . I'm in front of the store [28th Street Liquor Store]."

166. On or about November 7, 2023, PERKINS conducted at least one hand-to-hand drug transaction with a drug customer at or around the Cedar Estates.

167. On or about November 7, 2023, D. JOHNSON conducted at least five hand-to-hand drug transactions with drug customers at or around the Cedar Estates.

168. On or about November 8, 2023, between approximately 11:26 a.m. and 11:36 a.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, "Loon [E. JOHNSON] said green light," and ELLIOTT replied, "Ok say nomo." R. MULLINS continued, "Ox can take yu out there to see him." ELLIOTT responded, "Bet." R. MULLINS texted ELLIOTT, "I ain't going to see dat n***a I gave em to da family but ceeg [Cortez Tyree, named but not indicted herein] a go to he [E. JOHNSON] love ceeg." ELLIOTT replied, "I know yu ain't going I'm saying let's make it happen." R. MULLINS responded, "Hit him up noodles [BURCHETT] said he said geen light."

169. On or about November 8, 2023, at approximately 6:04 p.m., BURCHETT and JONES-FERRELL had a phone conversation. During the conversation, JONES-FERRELL said that he was "down the way [area around the intersection of East 30th Street and Cedar Avenue]."

JONES-FERRELL continued, “Beater [N.M.] had me hit a play,” then asked, “You on the Second?” BURCHETT replied, “Hell yeah . . . I had went on the Second and took a nap.”

170. On or about November 8, 2023, between approximately 8:28 p.m. and 8:31 p.m., Tyree sent E. JOHNSON several text messages. Tyree said, “I finally got you line [phone number] from dunn [R. MULLINS].” Tyree continued, “I need to holla at you. I need some blues [fentanyl pills] and some raw [uncut drugs].” Tyree said, “I will come myself. Hit me up bruh.”

171. On or about November 9, 2023, in Cleveland, Ohio, D. JOHNSON was the driver and sole occupant of a red Jaguar XR. D. JOHNSON possessed marijuana, \$828 in U.S. currency, and a grey Ruger LC9 handgun, bearing serial number 457-88160, in the Jaguar.

172. On or about November 9, 2023, at approximately 7:34 a.m., R. MULLINS texted ELLIOTT, “N***s can go see loon [E. JOHNSON] early.”

173. On or about November 9, 2023, between approximately 10:17 a.m. and 10:54 a.m., E. JOHNSON and Tyree had a text message conversation. During the conversation, Tyree texted, “Wud up bruh I’m tryna pull up . . . like today,” and E. JOHNSON replied, “I’m here.” Tyree texted, “I’m coming with bru em.” JOHNSON responded “Ok.”

174. On November 9, 2023, between approximately 10:17 and 10:55 a.m., BURCHETT and E. JOHNSON engaged in a text message conversation. BURCHETT said, “Trying to see you in a couple hours [for a drug transaction].” E. JOHNSON replied, “Come on.” BURCHETT said, “Me in Moo [ELLIOTT] getting our ride text you wen we on the road.”

175. On or about November 9, 2023, at approximately 12:53 a.m., an unknown man and BURCHETT had a phone conversation. The unknown man asked, “You on the O?” BURCHETT said, “Yeah.” The unknown man asked, “Somebody at the spot [Cedar Estates,

Apartment 91 or Apartment 96]? I'm trying to get some bags [of drugs]." BURCHETT asked, "How much you want?" The unknown man said, "I just want a gram," then asked, "You on the second [Apartment 91] or third floor [Apartment 96]?" BURCHETT responded, "I'm at my peoples, spot. Go to the third floor [Apartment 96], there's some weed up there." The unknown man asked, "Who all up there?" BURCHETT responded, "Beater [N.M.], Scrappy [Linson], and Moo [ELLIOTT]."

176. On November 9, 2023, at approximately 1:29 p.m., Tyree sent E. JOHNSON two text messages. Tyree said, "We [Tyree, BURCHETT, and HORTON] on da way bruh." Tyree then asked, "You got x [Xanax/MDMA] pills."

177. On or about November 9, 2023, at approximately 2:09 p.m., R. MULLINS sent a text message to Linson stating, "Loon [E. JOHNSON] back wit da bagg to moo [ELLIOTT] an omerta on Day way to see him." Linson replied, "Ok fasho . . . Hope he drops the load on the guys man." R. MULLINS responded, "I think yu need to call loon [E. JOHNSON] yoself he put yu in charge of dat part." Linson replied, "Fasho."

178. On or about November 9, 2023, at approximately 2:16 p.m., ELLIOTT sent a text message to E. JOHNSON stating, "53 min away."

179. On or about November 9, 2023, at approximately 3:09 p.m., ELLIOTT sent a text message to E. JOHNSON stating, "Here."

180. On or about November 9, 2023, at approximately 3:10 p.m., BURCHETT had a phone conversation with E. JOHNSON. During the conversation, BURCHETT said, "we at the shop [on Mahoning Avenue, Warren, Ohio]." E. JOHNSON said, "Alright I'm . . . Come to the, come to the" Thereafter, E. JOHNSON distributed fentanyl pills to BURCHETT, Tyree, and HORTON.

181. On or about November 9, 2023, between approximately 6:48 p.m. and 6:56 p.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, “And didn’t he show you the blues,” and ELLIOTT replied, “He sold em.” R. MULLINS continued, “So y’all ain’t get s**t but conversation.” ELLIOTT replied “That’s why I’m staying bra nu [BURCHETT] got some and seg [Tyree].”

182. On or about November 9, 2023, at approximately 7:31 p.m., ELLIOTT and BURCHETT had a phone conversation. During the conversation, ELLIOTT asked, “You got that pole [gun]?” BURCHETT replied, “No, hell naw. You said pole [gun]?” ELLIOTT said, “Yeah, in the back.” BURCHETT said, “Hell no, I never found it. You hear me?” Later, BURCHETT said, “Alright, I don’t know what makes you think I was going to hop back on the road with that dumba** gun.” ELLIOTT said, “I wouldn’t be riding with it either. He thought you put it somewhere.”

183. On or about November 9, 2023, at 8:06 p.m., HORTON drove a white 2014 BMW, with BURCHETT and Tyree as passengers, when it was stopped by Streetsboro Police officers on Ohio State Route 14. Tyree possessed 55.09 grams of fentanyl pills, which E. JOHNSON had supplied.

184. On or about November 9, 2023, at 8:48 p.m., ELLIOTT and BURCHETT had a phone conversation. During the conversation, BURCHETT said, “They [police] put Seed [Tyree] in the bag, man. I think they about to take [arrest] Seed [Tyree].” ELLIOTT asked, “What happened?” BURCHETT said, “I don’t know, man. They just put him in the back [of a police car] . . . They think he got a warrant.”

185. On or about November 9, 2023, at approximately 11:11 p.m., BURCHETT and LEE had a phone conversation. During the conversation, BURCHETT asked, “Are you all in the

lot across from the Store [28th Street Liquor Store]?” LEE replied, “Yeah.” BURCHETT asked, “Oh, Beater [N.M.] out there?” LEE asked, “Where you at Noods [BURCHETT]?” BURCHETT replied, “I’m on the Third.” BURCHETT told LEE to “ask Beater [N.M.]; did dude ever come get them strips [suboxone strips]?” LEE said, “Hey. Beat [N.M.], hey Beat, hey Beater . . . Noods said, ‘Did dude ever come get the strips?’ Noods said, Did you ever come get the strips? He [N.M.] said, ‘Yeah.’”

186. On or about November 9, 2023, PERKINS conducted at least one hand-to-hand drug transaction with a drug customer at or around the Cedar Estates.

187. On or about November 12, 2023, PERKINS conducted at least five hand-to-hand drug transactions with drug customers at or around the Cedar Estates.

188. On or about November 12, 2023, at approximately 12:17 p.m., BURCHETT recorded a video of himself and PERKINS at or around the Cedar Estates. BURCHETT said, “We [Fully Blooded Felons members] on the block with this s**t [drugs], man. In the A.M. [morning]. Like always. There ain’t never a time we ain’t on our block.” During the video, BURCHETT spoke to someone off camera, stating, “Oh you want to grab [buy drugs]? Talk to them n****s [motioning toward PERKINS].”

189. On or about November 12, 2023, at approximately 10:49 p.m., LEE and BURCHETT had a phone conversation. During the conversation, LEE said, “Hey, Noodles [BURCHETT], let me get some of your brick [drugs].” BURCHETT replied, “It gone, boy.” BURCHETT asked, “Where you at?” and LEE replied, “On the Third.”

190. On or about November 13, 2023, at approximately 10:08 a.m., HAMMOND and R. MULLINS had a phone conversation. During the conversation, HAMMOND said, “I’m on my way down now. I need some iron [a gun], though.” R. MULLINS asked, “Like, what type

of iron [gun]?" HAMMOND said, "Any type of iron [gun], I'm lactose." R. MULLINS replied, "Ahh that's so crazy, me you, ahh yeah you gotta pull up, n***a got my pole [gun], uhh, n***a got my s**t took. N***a on play [drug deal], n***a throw one of the homies in a choke, take the 40 [.40 caliber gun]. Moo [ELLIOTT] had to toss, like. two [guns], like, ah, there's so many different poles [guns] missing, my G." Later, HAMMOND said, "Listen, cuz. There's s**t goin' on. I need to take [rob] something. That's what I'm telling you real quick before I even catch the pack [drugs], I need to take [rob] something." R. MULLINS replied, "She [HAMMOND's significant other] locked up right now?" HAMMOND responded, "cause it happened at her spot." R. MULLINS said, "Hold on, look, Moo [ELLIOTT] out there. Bruh got a few dollars on a few n****s out there, bruh . . . Yeah, call bruh [ELLIOTT], man, let him know the situation [that HAMMOND's significant other is incarcerated] ASAP, bruh . . . she [HAMMOND's significant other] gotta get out of there [bonded out of jail], she got to."

HAMMOND said, "I'm 'bout to get her out there right now. They [police] just kept her this morning." Later, HAMMOND continued, "I'm about to strip something [rob someone] in the hood too, though. That's why I just needed a pole [gun]. I was about to take one of these hoe n****s real quick [rob someone]." In the background, R. MULLINS yelled to BURCHETT, "Noo [BURCHETT]! Noo! Donny [HAMMOND] said, Let me see your pole [gun] real quick, he [HAMMOND] about to go strip something [rob someone], and he ain't got nothing [HAMMOND does not have a gun]." R. MULLINS asked HAMMOND, "You want the Mac [Mac-10-style semi-automatic handgun]? Oh yeah, we got the Macky [Mac-10-style semi-automatic handgun] out." HAMMOND replied, "Say less. I'm about to come down in a second."

191. On or about November 13, 2023, at approximately 10:30 a.m., HAMMOND drove a black Ford Edge eastbound on Cedar Avenue near East 30th Street, Cleveland, Ohio.

192. On or about November 13, 2023, at approximately 10:30 a.m., HAMMOND turned southbound on East 30th Street, and then westbound on Central Avenue in Cleveland, Ohio, still driving the Ford Edge.

193. On or about November 13, 2023, at approximately 10:30 a.m., HAMMOND turned into the parking lot at or around Central Avenue, Cleveland, Ohio, and then fled on foot from the Ford Edge after Cleveland Police attempted a traffic stop.

194. On or about November 13, 2023, at approximately 10:30 a.m., HAMMOND fled northbound, and discarded into a garbage can a Masterpiece Arms, 9 millimeter semi-automatic handgun [Mac-10-style semi-automatic handgun], bearing serial number FX00453, loaded with one round of ammunition in the chamber.

195. On or about November 13, 2023, at approximately 10:30 a.m., HAMMOND possessed a fifty-round drum magazine and his Ohio identification card in the Ford Edge.

196. On or about November 13, 2023, at approximately 10:57 a.m., HAMMOND and R. MULLINS had a phone conversation. During the conversation, HAMMOND said, "Boy, I just got in on a chase [fled from police]." HAMMOND continued, "Hell yeah, on the O [Cedar Estates]." R. MULLINS asked, "Man, they [police] hopped out on your or something?" HAMMOND replied, "Hell yeah, they got on the car. I was hiding that clip [firearm] now." Thereafter, R. MULLINS handed his cellular telephone to unindicted coconspirator N.M., who directed HAMMOND where to hide from police.

197. On or about November 13, 2023, at approximately 11:01 a.m., HAMMOND and N.M. had a conversation on R. MULLINS' cellular telephone. During the conversation,

HAMMOND and N.M. discussed where HAMMOND was hiding. HAMMOND said, "I threw the pole [Mac-10-style semi-automatic handgun] in the trash, in the garbage can right there." Later, HAMMOND said, "I threw the Mac in the garbage can, though, but the clip [fifty-round drum magazine] still in the car." The two discussed HAMMOND's escape routes. Later, N.M. said, "There's 50, like 40 of them [law enforcement] right here standing literally in the middle watchin' us all, like" HAMMOND said, "They don't know where I went." N.M. replied, "Don't move." Then N.M. said, "They got the Mac [Mac-10-style semi-automatic handgun]." HAMMOND asked, "They got it?" N.M. confirmed, "Yeah." HAMMOND asked, "They got it out of the garbage?" N.M. replied, "Yeah, they got that b***h."

198. On or about November 13, 2023, at approximately 4:23 p.m., ELLIOTT and R. MULLINS had a phone conversation. During the conversation, ELLIOTT and R. MULLINS discussed a recent shipment of an unknown controlled substance that was low quality. R. MULLINS said, "Tell that n***a that s**t he gave you ain't right." Later ELLIOTT said, "Listen, alright. So this is what I am telling you. At this point, it was free dope." R. MULLINS said, "It's the principle. I am saying, it's the principle." R. MULLINS continued, "You can't let that slide bruh. You can't. 'Cause guess what, if we was selling that s**t to Nuk or somebody, and they would have came back and did something to one of us for that. Then what? You cannot let that slide. He gave you some s**t, he lied to you, and said it was that and it wasn't. Either you going to say something to that n***a." Later, R. MULLINS said, "That's what I am trying to tell you. So look, this is where I am coming in at. Once you blown down on him and let that n***a know where he went wrong at he gonna call me. And let me handle the rest."

199. On or about November 13, 2023, at approximately 4:36 p.m., R. MULLINS and BURCHETT had a phone conversation. During the conversation, R. MULLINS said, "Man

guess what, I . . . it's so crazy, 'cause, like, I am thinking, I am just on the porch, and I see the Volkswagen arrive. I am thinking Fatty [LEE] pulling up clean. I ain't know his thing was gone, man. I am thinking it's probably on the flat. Nu [BURCHETT], you never told me they took the whip [car]." BURCHETT replied, "I never knew." R. MULLINS continued, "Man, Fatty [LEE] been keeping too many secrets. Man, we ain't know about the X [ecstasy], now we don't know about the whip. Ahh, Nu [BURCHETT], what else he keeping a secret about?" BURCHETT replied, "You ain't know about the ecstasy. . . Alright, here, let me see what this says."

200. On or about November 14, 2023, at approximately 8:06 p.m., HORTON called R. MULLINS and told him to bring a "pyrex [glass dish used to manufacture drugs, including cocaine base ("crack")]."

201. On or about November 15, 2023, at approximately 6:22 p.m., R. MULLINS texted PERKINS, "Yu got Caine." PERKINS replied, "Nope." R. MULLINS responded, "I got Grammys 45," and PERKINS texted, "Sayless."

202. On or about November 17, 2023, at approximately 2:12 p.m., J. WILLIAMS called BURCHETT on the telephone. BURCHETT said, "Man I need my money man, how much you got? Man, I'm right here on the O [Cedar Estates]." J. WILLIAMS replied "Oh, you still down. Come sell me half that s**t real quick." BURCHETT replied, "Alright."

203. On or about November 17, 2023, at approximately 8:51 a.m., ELLIOTT and BURCHETT had a phone conversation to discuss smuggling cell phones into prisons. During the conversation, ELLIOTT said, "It will be, like, be two days. we will have three phones three 15's [Apple iPhone 15], and I should be able to bust a play for like [\$]4500 for us for that. I'mma cut you in." Later, ELLIOTT said, "You know they out there." BURCHETT asked,

“Who, the police?” ELLIOTT said, “No, I’m talking about Loon [E. JOHNSON] and Kay.”

BURCHETT confirmed, “Yeah, yeah, they out there.” ELLIOTT said, “Yeah, it’s on, boy. He talking about he going to get 1 that turn into 7 [expanding a quantity of drugs].” BURCHETT asked, “What about them blues [fentanyl pills]?” ELLIOTT said, “Big order of them.”

BURCHETT said, “I will be back down there [Warren, Ohio, area where E. JOHNSON distributes].” ELLIOTT replied, “I’mma let you know as soon as the bird lands.”

204. On or about November 18, 2023, at approximately 4:40 p.m., BURCHETT and LEE had a phone conversation. During the conversation, BURCHETT said, “Let me get 5 blues [fentanyl pills] for \$25 . . . that’s \$5 a piece, bro.” LEE replied “Here I come, bruh.”

205. On or about November 20, 2023, at approximately 10:22 a.m., Customer 4 and BURCHETT had a phone conversation. During the conversation, Customer 4 said, “My mom’s coming right, but look she’s bringing me 50 bucks, could you throw me just a two [fentanyl pills]. Just for the next like 30 minutes, bro, like, I promise you, bro, I’m, like, waiting outside.” BURCHETT asked, “You talking about them clues [fentanyl pills, commonly referred to as ‘blues’]?” Customer 4 asked, “What do you mean?” BURCHETT replied, “On the little blue things [fentanyl pills].” Customer 4 responded, “On the blue things.” BURCHETT said, “What you talking, man. Stop talking hot [openly about drugs] on the phone. Just come holla at me in person.” Customer 4 said, “Alright. I’m coming up now. I’m waiting outside by the store [28th Street Liquor Store]. I’m coming upstairs now. What . . . Second [Cedar Estates, Apartment 91] or Third [Cedar Estates, Apartment 96]?” BURCHETT replied, “Second [Apartment 91], man.”

206. On or about November 21, 2023, at approximately 7:04 p.m., R. MULLINS called BURCHETT on the telephone. R. MULLINS asked, “Hey, you got the pyrex [glass dish used to manufacture drugs, including cocaine base (“crack”)] up there [Cedar Estates, Apartment

96]?” BURCHETT had trouble hearing R. MULLINS, but BURCHETT eventually said, “Nope. I don’t think so.”

207. On or about November 21, 2023, from approximately 6:46 p.m. to approximately 6:47 p.m., R. MULLINS had a text message conversation with an unknown person. During the conversation, R. MULLINS said, “My g, I need a Pyrex [glass dish used to manufacture drugs, including cocaine base (“crack”)].” The unknown person asked, “Who is this?” R. MULLINS replied, “Dunn [R. MULLINS].”

208. On or about November 21, 2023, at approximately 7:23 p.m., LEE and BURCHETT had a phone conversation. During the conversation, LEE asked, “Where the .380 [.380 caliber handgun] at?” BURCHETT replied, “It’s in my room on that shelf.”

209. On or about November 21, 2023, at approximately 8:28 p.m., R. MULLINS and an unknown man had a phone conversation. During the conversation, R. MULLINS said, “What’s up wit you?” The unknown man said, “S**t. Man, you, know what I had left. Uh . . . got some 45s [.45 caliber ammunition], 9s [9 millimeter ammunition], and three 8s [.380 caliber ammunition].” R. MULLINS replied, “On the slugsides.” The two then agreed to meet the following day once the unknown man was off work.

210. On or about November 21, 2023, at approximately 8:32 p.m., R. MULLINS and BLACKWELL had a phone conversation. During the conversation, R. MULLINS said, “Hey, White Boy [Blackwell], this Dunn [R. MULLINS].” BLACKWELL asked, “What’s up?” R. MULLINS said, “Hey, I’m down here with Cam [HORTON], man, you don’t own no pyrex set, we need somethin’ to whip-up [manufacture cocaine base (“crack”)] in.” BLACKWELL said, “Let me call my uncle real quick.” R. MULLINS replied, “You know where we at, though, right?” BLACKWELL responded, “Yeah.”

211. On or about November 22, 2023, at approximately 1:03 p.m., R. MULLINS sent a text message to an unknown person stating, “Tell him give me [\$]140 or these [\$]120 for the last two grams of 🐶🐶🐶 [three dog emojis, referring to heroin or other opiate/opioid].”

212. On or about November 22, 2023, at approximately 2:02 p.m., R. MULLINS and LEE had a phone conversation. During the conversation, R. MULLINS said, “Hey, I ain’t see . . . you upstairs?” LEE said, “Naw.” R. MULLINS asked, “You back outside?” LEE replied, “I’m over at the tow lot.” R. MULLINS said, “I was about to say, n***a. Ain’t nobody outside on the strip [the grassy area immediately adjacent to Cedar Estates Apartments]. Your a** need to be out there.” LEE said, “No, I was just out there. I was just out in that b***h.”

213. On or about November 22, 2023, at approximately 2:26 p.m., R. MULLINS sent a text message to an unknown person stating, “I’ll give you 5 grams of rocks [crack cocaine], like, the lil shake rocks, for [\$]170.”

214. On or about November 24, 2023, Tyree and E. JOHNSON had a text message conversation. During the conversation, E. JOHNSON asked, “Wat took so long to call me.” Tyree replied, “Tryna get s**t back in motion [resume drug distribution].” Tyree continued, “You know me I’m bag [money] chasing.” E. JOHNSON asked, “Wat happen.” Tyree replied, “Lil warnt [arrest warrant] . . . I had . . . nothing major.” Tyree continued, “But shid was up with them blues clues [the fentanyl pills were high quality].”

215. On or about November 25, 2023, between approximately 12:32 a.m. and 8:42 a.m., Tyree and E. JOHNSON had a text message conversation. During the conversation, Tyree asked, “Them BB blues [fentanyl pills] in yet.” E. JOHNSON replied, “Nope.”

216. On or about November 25, 2023, between approximately 5:06 p.m. and 5:42 p.m., R. MULLINS and LEE had a text message conversation. During the conversation,

R. MULLINS texted, “Stop sellin yo zips [ounce of marijuana] for a 100 no profit my y ceeg [Tyree] would of paid 125 . . . Either buss yo shot dwn yu don’t sell zips bra.” LEE responded, “Nahh that was a one time thing.”

217. On or about November 28, 2023, at approximately 6:32 p.m., J. WILLIAMS and BURCHETT had a phone conversation. During the conversation, J. WILLIAMS said, “I’m about to have my note [drug customer] come to the door, gimme, gimme two joints for me real quick . . . the little safe . . . the key to that little safe should be right there, on the floor . . . just get two blues [fentanyl pills] on the safe.” BURCHETT replied, “I am on the Second right now . . . hold on.” J. WILLIAMS said, “Alright, call me when you get up there [the Third] real quick.”

218. On or about November 28, 2023, at approximately 6:36 p.m., BURCHETT and J. WILLIAMS had a phone conversation. During the conversation, BURCHETT asked, “Where the blues [fentanyl pills] at?” J. WILLIAMS responded, “In that room, in that little safe. Look at the safe. You don’t see that little key anywhere?” Later, BURCHETT asked, “What script these [pills] is? What do you want for these X-pills [Xanax]?” J. WILLIAMS responded, “A dollar a piece.” BURCHETT said, “I’m about to get all these.”

219. On or about November 28, 2023, at approximately 6:41 p.m., BURCHETT and J. WILLIAMS had a phone conversation. During the conversation, BURCHETT said, “I am counting these pills out right now.” J. WILLIAMS asked, “You said that you counting them beans [pills] out?” BURCHETT said, “Yeah.” J. WILLIAMS said, “I need to be able to keep, like, 15 of them [pills].” BURCHETT replied, “Alright. So leave 15 out?” J. WILLIAMS said, “Yeah, need 15 for my peoples [drug customers].” Later, BURCHETT asked, “What do you want me to do about this play downstairs? I can't find the key.” J. WILLIAMS said, “Man, it ain’t. You just. That n***a got to wait, then. Alright, here I come. I’m about to come.”

BURCHETT replied, "Hold on. I think I found it. I found the key to the safe!" J. WILLIAMS replied, "Give that n***a four pills, man . . . give him four pills of that fat ones." BURCHETT asked, "The ones on the left bag, or the bigger bag?" J. WILLIAMS replied, "The less bag. Give him five of them." BURCHETT asked, "Out of the one that is in the less bag?" J. WILLIAMS said, "Yeah, the ones that, yeah the fat pill, the fat pills." Later, BURCHETT asked, "What do you want me to do with this key?" J. WILLIAMS replied, "The safe key, put . . . put it back down somewhere."

220. On or about November 29, 2023, between 2:52 a.m. and 2:55 a.m., R. MULLINS and ELLIOTT had a text message conversation. During the conversation, R. MULLINS texted, "I'm so fully." ELLIOTT replied, "So fully so fully." ELLIOTT texted, "Fatmike on the phone with thay plug [drug supplier]." R. MULLINS replied, "Yes sir."

221. On or about November 29, 2023, at approximately 1:16 p.m., HORTON and BURCHETT had a phone conversation. During the conversation, BURCHETT said, "Cam [HORTON]." HORTON replied, "Boy, I left my pole [firearm]. I'm, uh, I just hit my play [drug deal]. I'm about to grab it, though. Just hit a sweet little lick [drug deal]."

222. On or about November 29, 2023, at approximately 4:10 p.m., R. MULLINS and an unknown woman had a phone conversation about ELLIOTT's arrest in Youngstown, Ohio. During the conversation, R. MULLINS said, "U.S. Marshals show up for warrants like that for n****s like us. N***a think about it if it was regular pimp n***a, the regular uniform police would have showed up. The U.S. Marshals showed up fell me. They show up for armed and dangerous n****s like me [R. MULLINS] or Moo [ELLIOTT]."

223. On or about December 2, 2023, at approximately 2:26 p.m., BURCHETT and an unknown man had a phone conversation. During the conversation, BURCHETT said, "L Burner

[unindicted coconspirator B] 'bout to pull up. I got weed on the Third.” BURCHETT continued, “I need you to put an eighth on the scale for the legend for me . . . my weed, it’s in my room . . . just put an eighth on the scale and put it back.” The unknown man asked, “You want me to just give it to him?” BURCHETT replied, “Yeah, give him an eighth, don’t give him the whole zip [ounce], n***a.”

224. On or about December 2, 2023, at approximately 2:59 p.m., BURCHETT and an unknown man had a phone conversation. During the conversation, BURCHETT asked, “Where Fatty [LEE] at?” The unknown man said, “Hold on, everyone on the Third.” BURCHETT asked, “Cam [HORTON] in there?” The unknown man replied, “Yeah.” BURCHETT said, “Aye, tell him to get an eighth from him and give it to L Burner.”

225. On or about December 5, 2023, at approximately 11:42 a.m., BLACKWELL and BURCHETT had a phone conversation. During the conversation, BURCHETT said, “Loon [E. JOHNSON] was trying to holler at you. I was trying to plug you and Loon together. He needed your intel on something.” BLACKWELL replied, “Oh, he [E. JOHNSON] gone?” BURCHETT said, “Nah, he still out of town. He trying to figure some s**t out. He said you know about it, you know that’s your lane. Yeah, he out there right now with some s**t.” BLACKWELL replied, “He’s [E. JOHNSON] in Houston?” BURCHETT said, “Yeah, I think he’s still in Houston.”

226. On or about December 5, 2023, at approximately 2:43 p.m., BURCHETT and LEE had a phone conversation. During the conversation, BURCHETT asked, “Hey, man, who got the key to the Second?” LEE replied, “Dunn [R. MULLINS] have it.”

227. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS, BURCHETT, and Tyree possessed fentanyl and fentanyl analogue, and cocaine with the intent to

distribute, along with digital scales, drug packaging materials, and multiple cellular telephones inside the Second, i.e., Apartment 91 of the Cedar Estates.

228. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS and BURCHETT possessed a Taurus, Model G3, 9 millimeter handgun, bearing serial number ABA253556, ammunition, body armor, and other assorted firearms parts and accessories inside the Second, i.e., Apartment 91 of the Cedar Estates.

229. On or about December 6, 2023, at approximately 6:00 a.m., BURCHETT, R. MULLINS, and LEE possessed fentanyl and fentanyl analogue, suboxone, methamphetamine, and cocaine with the intent to distribute, along with digital scales, drug packaging materials, and multiple cellular telephones inside the Third, i.e., Apartment 96 of the Cedar Estates.

230. On or about December 6, 2023, at approximately 6:00 a.m., R. MULLINS and BURCHETT possessed an Arminius, .38 Special revolver, bearing serial number 024516; a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251; a Glock, Model 42, .380 caliber handgun, bearing serial number AFZY286; an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126; a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672; and a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO, along with ammunition, and other assorted firearms parts and accessories inside the Third, i.e., Apartment 96 of the Cedar Estates.

231. On or about December 12, 2023, between approximately 6:19 a.m. and 6:20 a.m., Linson texted E. JOHNSON about assisting R. MULLINS in obtaining a defense attorney.

232. On or about December 13, 2023, between approximately 5:25 p.m. and 7:12 p.m., E. JOHNSON and HORTON had a text message conversation. During the conversation,

E. JOHNSON sent an address for the Fairfield Inn and Suites in Austintown, Ohio, to HORTON and asked, "How far away?" HORTON replied, "15 minutes" and then, "I'm here."

233. On or about January 18, 2024, E. JOHNSON exited a Holiday Inn on South Avenue in Youngstown, Ohio. E. JOHNSON left vacuum sealed bags containing fentanyl residue inside of the hotel room.

234. On or about February 1, 2024, E. JOHNSON recorded a video of himself with several thousand blue fentanyl pills at a hotel in Houston, Texas.

235. On February 2, 2024, E. JOHNSON travelled from Houston, Texas, to Cleveland, Ohio, on United Airlines flight number 1544.

236. On February 2, 2024, at approximately 12:54 p.m., E. JOHNSON arrived at the Cleveland Hopkins International Airport in Cleveland, Ohio.

237. On February 2, 2024, at approximately 1:44 p.m., E. JOHNSON exited the Cleveland Hopkins International Airport rental car center and entered a Dodge Durango ("Durango"). Thereafter, E. JOHNSON drove the Durango out of the rental center parking lot.

238. On February 2, 2024, at approximately 1:45 p.m., E. JOHNSON pulled into a parking lot on Cleveland Parkway in Cleveland, Ohio, in the Durango. Thereafter, E. JOHNSON switched cars with C.B. [a person known to the Grand Jury but not indicted herein], who had driven a Dodge Ram pickup truck into the same parking lot.

239. On February 2, 2024, at approximately 1:45 p.m., E. JOHNSON, who was driving the Dodge Ram, and C.B., driving the Durango, departed the parking lot.

240. On or about February 2, 2024, approximately 1:46 p.m., E. JOHNSON received a text message from A.S. [a person known to the Grand Jury but not indicted herein]. A.S. said, "24XX cedar ave [location for drug transaction]."

241. On February 2, 2024, between approximately 1:46 p.m. and approximately 2:05 p.m., E. JOHNSON, who was driving the Dodge Ram, and C.B., who was driving the Durango, drove in tandem to the intersection of East 28th Street and Cedar Avenue, Cleveland, Ohio.

242. On or about February 2, 2024, at approximately 2:05 p.m., E. JOHNSON was stopped by the Ohio State Highway Patrol ("OSHP") while driving the Dodge Ram. E. JOHNSON provided false identification information to OSHP. A.S. was present when OSHP stopped E. JOHNSON. E. JOHNSON refused get out of the Dodge Ram and then sped off and fled from police. E. JOHNSON crashed the Dodge Ram in the area of College Avenue and East 38th Street, Cleveland, Ohio and ran away.

All in violation of Title 21, United States Code, Section 846.

COUNT 3

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

243. On or about April 1, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant JERRELL JONES-FERRELL, aka RUGA, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Robbery, on or about October 23, 2017, in case number CR-17-619252, in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm and ammunition, to wit: a Glock 17, 9 millimeter handgun, bearing serial number RGT891, and ammunition, said firearm and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 4

(Kidnapping in Aid of Racketeering, 18 U.S.C. §§ 1959(a)(1) and 2)

The Grand Jury further charges:

244. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons, as described in paragraphs one through eighteen of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leaders, members, and associates, constituted an “enterprise” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

245. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving robbery, in violation of Ohio Revised Code, Sections 2911.01, 2911.02, 2923.01, 2923.02, and 2923.03; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

246. From on or about June 30, 2022, through on or about July 6, 2022, RAVEN MULLINS, aka DUNNY, aka DUN; HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; and ADRIONNA NULL, aka ALI; MYEASHA WEST, aka ACTION; and KYLA SHARIE TYLER, aka YAYEO, each aided and abetted by the other and by others, for the purpose of gaining entrance to, and maintaining and increasing position in, the Fully Blooded Felons, an enterprise engaged in racketeering activity, did knowingly and intentionally kidnap Victim B, in violation of Ohio Revised Code, Sections 2905.01 and 2923.03.

In violation of Title 18, United States Code, Sections 1959(a)(1) (Kidnapping in Aid of Racketeering) and 2.

COUNT 5

(Assault Resulting in Serious Bodily Injury in Aid of Racketeering, 18 U.S.C. §§ 1959(a)(3) and 2)

247. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons, as described in paragraphs one through eighteen of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leaders, members, and associates, constituted an “enterprise” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

248. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving robbery, in violation of Ohio Revised Code, Sections 2911.01, 2911.02, 2923.01, 2923.02, and 2923.03; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

249. From on or about June 30, 2022, through on or about July 6, 2022, RAVEN MULLINS, aka DUNNY, aka DUN; HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; ADRIONNA NULL, aka ALI; MYEASHA WEST, aka ACTION; and KYLA SHARIE TYLER, aka YAYEO, each aided and abetted by the other and by others, for the purpose of gaining entrance to, and maintaining and increasing position in, the Fully Blooded

Felons, an enterprise engaged in racketeering activity, did knowingly and intentionally assault Victim B, resulting in serious bodily injury to Victim B, in violation of Ohio Revised Code, Sections 2903.11 and 2923.03,

In violation of Title 18, United States Code, Sections 1959(a)(3) (Assault Resulting in Serious Bodily Injury in Aid of Racketeering) and 2.

COUNT 6

(Murder in Aid of Racketeering, 18 U.S.C §§ 1959(a)(1) and 2)

250. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons, as described in paragraphs one through eighteen of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leaders, members, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

251. At all times relevant to this Second Superseding Indictment, the Fully Blooded Felons enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving robbery, in violation of Ohio Revised Code, Sections 2911.01, 2911.02, 2923.01, 2923.02, and 2923.03; kidnapping, in violation of Ohio Revised Code, Sections 2905.01, 2923.01, 2923.02, and 2923.03; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

252. On or about September 12, 2023, RAVEN MULLINS, aka DUNNY, aka DUN; HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; and JAMES CLEMONS, aka

FLOCK, aka POPE, aka FULLY POPE FLOCK, each aided and abetted by the other and by others, for the purpose of gaining entrance to, and maintaining and increasing position in the Fully Blooded Felons, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim D, in violation of Ohio Revised Code, Sections 2903.01, 2903.02, and 2923.03.

In violation of Title 18, United States Code, Sections 1959(a)(1) (Murder in Aid of Racketeering) and 2.

COUNT 7

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

253. On or about November 9, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DEVONTE JOHNSON, aka D NUT, aka NUT, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Robbery, on or about May 6, 2011, in case number CR-11-547232; and Drug Trafficking, on or about October 1, 2018, in case number CR-18-628909, both in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Ruger LC9, 9 millimeter handgun, bearing serial number 457-88160, and ammunition, said firearm and ammunition having previously been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 8

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2)

The Grand Jury further charges:

254. On or about November 9, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA and CHRISTEPHER HORTON, aka CAM, aka KILLA, did knowingly and intentionally possess with the intent to distribute 40 grams or more of mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 9

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

255. On or about November 13, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAVEN MULLINS, aka DUNNY, aka DUN, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Attempted Felonious Assault, on or about February 23, 2010, in case number CR-09-528770; Robbery, on or about August 8, 2011, in case number CR-11-549107; Burglary, on or about August 8, 2011, in case number CR-11-549708; Robbery, on or about December 20, 2011, in case number CR-11-554568, all in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Masterpiece Arms, 9 millimeter semi-automatic handgun, bearing serial number FX00453, and ammunition, said firearm and ammunition having previously been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 10

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

256. On or about November 13, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Attempted Aggravated Burglary, on or about September 25, 2017, in case number CR-17-616071; and Receiving Stolen Property (Motor Vehicle), on or about October 21, 2019, in case number CR-19-638889, both in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Masterpiece Arms, 9 millimeter semi-automatic handgun, bearing serial number FX00453, and ammunition, said firearm and ammunition having previously been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 11

(Illegal Receipt of a Firearm and Ammunition by a Person Under Indictment, 18 U.S.C. §§ 922(n) and 924(a)(1)(D))

The Grand Jury further charges:

257. On or about November 13, 2023, in the Northern District of Ohio, Eastern Division, Defendant DONTÉZ HAMMOND, aka DONNY, knowing he was then under indictment for a crime punishable by imprisonment for a term exceeding one year, that being: Drug Trafficking, filed on or about October 24, 2023, in Case Number CR-23-685776-A, in the Cuyahoga County Court of Common Pleas, did willfully receive a firearm, to wit: a Masterpiece Arms, 9 millimeter semi-automatic handgun, bearing serial number FX00453, and ammunition,

said firearm and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT 12

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

258. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RAVEN MULLINS, aka DUNNY, aka DUN and HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 13

(Possession with Intent to Distribute Cocaine Base (“Crack”), 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

259. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RAVEN MULLINS, aka DUNNY, aka DUN and HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 14

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B),
and 18 U.S.C. § 2)

The Grand Jury further charges:

260. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RAVEN MULLINS, aka DUNNY, aka DUN, HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, and JEFFREY LEE, aka FATTY, did knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 15

(Possession with Intent to Distribute Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C),
and 18 U.S.C. § 2)

The Grand Jury further charges:

261. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAVEN MULLINS, aka DUNNY, aka DUN, HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, and JEFFREY LEE, aka FATTY, did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 16

(Possession with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2)

The Grand Jury further charges:

262. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAVEN MULLINS, aka DUNNY, aka DUN, HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA and JEFFREY LEE, aka FATTY, did knowingly and intentionally possess with the intent to distribute 10 grams or more of a mixture and substance containing a detectable amount of acetylfentanyl, a Schedule I controlled substance and a fentanyl analogue, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 17

(Possession with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 841(a)(1) and (b)(1)(E), and 18 U.S.C. § 2)

The Grand Jury further charges:

263. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant RAVEN MULLINS, aka DUNNY, aka DUN, HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, and JEFFREY LEE, aka FATTY, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of buprenorphine, a Schedule III controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(E), and Title 18, United States Code, Section 2.

COUNT 18

(Felon in Possession of Firearms and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

264. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant RAVEN MULLINS, aka DUNNY, aka DUNN, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Attempted Felonious Assault, on or about February 23, 2010, in case number CR-09-528770; Robbery, on or about August 8, 2011, in case number CR-11-549107; Burglary, on or about August 8, 2011, in case number CR-11-549708; and Robbery, on or about December 20, 2011, in case number CR-11-554568, all in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms and ammunition, to wit: a Taurus G3, 9 millimeter handgun, bearing serial number ABA253556; an Arminius, .38 Special revolver, bearing serial number 024516; a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251; a Glock, Model 42, .380 caliber handgun, bearing serial number AFZY286; an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126; a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672; and a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO, and ammunition, said firearms and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 19

(Felon in Possession of Firearms and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

265. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Attempted Aggravated Burglary, on or about September 25, 2017, in case number CR-17-616071; and Receiving Stolen Property (Motor Vehicle), on or about October 21, 2019, in case number CR-19-638889, both in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms and ammunition, to wit: a Taurus G3, 9 millimeter handgun, bearing serial number ABA253556; an Arminius, .38 Special revolver, bearing serial number 024516; a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251; a Glock, Model 42, .380 caliber handgun, bearing serial number AFZY286; an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126; a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672; and a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO, and ammunition, said firearms and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 20

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

266. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant RAVEN MULLINS, aka DUNNY, aka DUN, did knowingly possess a

firearm in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 846, 841(a)(1), as charged in Count 1 of this Superseding Indictment, and Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts 12 through 17 of this Superseding Indictment, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 21

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

267. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, did knowingly possess a firearm in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count 1 of this Superseding Indictment, and Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts 12 through 17 of this Superseding Indictment, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 22

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

268. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant JEFFREY LEE, aka FATTY, did knowingly possess a firearm in

furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count 1 of this Superseding Indictment, and Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Counts 14 through 17 of this Superseding Indictment, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 23

(Interstate Travel in Aid of Racketeering, 18 U.S.C. § 1952(a)(3))

The Grand Jury further charges:

269. On or about February 2, 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ELIJAH JOHNSON, aka LOON, did travel in interstate commerce between the State of Texas and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Defendant thereafter did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

COUNTS 24-31

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

270. On or about the dates and approximate times listed below, in the Northern District of Ohio, Eastern Division and elsewhere, the Defendants listed below did knowingly and

intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846:

Count	Defendants	Date	Time
24	JERRELL JONES-FERRELL, aka RUGA	October 13, 2023	7:33 p.m.
25	HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA, and DEMARCUS ELLIOTT, aka MOO	October 23, 2023	5:36 p.m.
26	JEROME WILLIAMS, aka JAY	November 6, 2023	3:18 p.m.
27	JEFFREY LEE, aka FATTY	November 6, 2023	6:51 p.m.
28	ELIJAH JOHNSON, aka LOON	November 9, 2023	7:26 a.m. – 10:54 a.m.
29	RAVEN MULLINS, aka DUNNY, aka DUN	November 21, 2023	8:32 p.m.
30	DEON BLACKWELL, aka WHITE BOY	November 23, 2023	7:40 p.m.
31	CHRISTEPHER HORTON, aka CAM, aka KILLA	November 29, 2023	1:16 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

271. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States Code, Section 924(d)(1); Title 18, United States Code, Section 1963; and Title 28 United States Code, Section 2461(c), the allegations of Counts 1 through 31 are incorporated herein by reference.

As a result of the foregoing offenses, Defendants RAVEN MULLINS, aka DUNNY, aka DUN (“R. MULLINS”); HENRY BURCHETT, aka NOODLES, aka NOO, aka OMERTA; ELIJAH JOHNSON, aka LOON (“E. JOHNSON”); DEMARCUS ELLIOTT, aka MOO; DONTÉZ HAMMOND, aka DONNY; JEFFREY LEE, aka FATTY; JERRELL JONES-FERRELL, aka

RUGA; DEVONTE JOHNSON, aka D NUT, aka NUT ("D. JOHNSON"); JEROME WILLIAMS, aka JAY ("J. WILLIAMS"); CHRISTEPHER HORTON, aka CAM, aka KILLA; DEEUNDRRA PERKINS, aka DRIZZY; and DEON BLACKWELL, aka WHITE BOY; JAMES CLEMONS, aka FLOCK, aka POPE, aka FULLY POPE FLOCK; ALEX DARDEN, aka LIL' PEE WEE; and ESMOND WILLIAMS, aka RELLE ("E. WILLIAMS"); ADRIONNA NULL, aka ALI; MYEASHA WEST, aka ACTION; and KYLA SHARIE TYLER, aka YAYEO, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; any firearms and ammunition involved in or used in such violations; any property real or personal, which constitutes or is derived from proceeds traceable to such violations; any interest the person acquired or maintained in violation of Title 18, United States Code, Section 1962; any interest in, security of, claim against or property or contractual right of any kind affording a source of influence over, any enterprise which the person has established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962; including, but not limited to, the following:

- A. Ruger LC9, 9-millimeter handgun, bearing serial number 457-88160, and ammunition (DEVONTE JOHNSON);
- B. Masterpiece Arms, 9 millimeter semi-automatic handgun, bearing serial number FX00453, and ammunition (RAVEN MULLINS and HENRY BURCHETT);
- C. .40 caliber Smith and Wesson handgun, bearing serial number DYE4745, and ammunition (DEMARCUS ELLIOTT);

- D. a Taurus G3, 9 millimeter handgun, bearing serial number ABA253556, (RAVEN MULLINS and HENRY BURCHETT).
- E. an Arminius, .38 Special revolver, bearing serial number 024516 (RAVEN MULLINS and HENRY BURCHETT).
- F. a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251 (RAVEN MULLINS and HENRY BURCHETT);
- G. a Glock, Model 42, .380 caliber handgun, bearing serial number AFZY286 (RAVEN MULLINS and HENRY BURCHETT);
- H. an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126 (RAVEN MULLINS and HENRY BURCHETT);
- I. a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672 (RAVEN MULLINS and HENRY BURCHETT);
- J. a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO (RAVEN MULLINS and HENRY BURCHETT);
- K. Miscellaneous ammunition (RAVEN MULLINS and HENRY BURCHETT).
- L. a Glock 17, 9 millimeter handgun, bearing serial number RGT891 (JERRELL JONES-FERRELL).

272. If any of the above-described forfeitable property, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property described in this forfeiture allegation.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.